

## Summary of changes made to the Draft Production Standard post public consultation I.

### **Summary of change**

This document presents an overview of the comments received during the first public consultation (2020), and the subsequent changes made to the standard by the Standard Revision Working Group (SRWG) following discussions on the varied inputs received.

As part of the post-public consultation standard revision process (phase II), the SRWG has taken part in four full working group videoconferences, as well as twelve targeted videoconferences in smaller subgroups in order to discuss the comments received during the public consultation and decide any needed edits. Each call was interspersed with remote work and feedback loops to help advance the standard revision process as well as unilateral discussions between 2-3 SRWG members to agree final wording to propose to the full SRWG.

This led to version 5.7 of the Production Standard which is now presented for a second round of public consultation.

## Summary of Public Consultation I

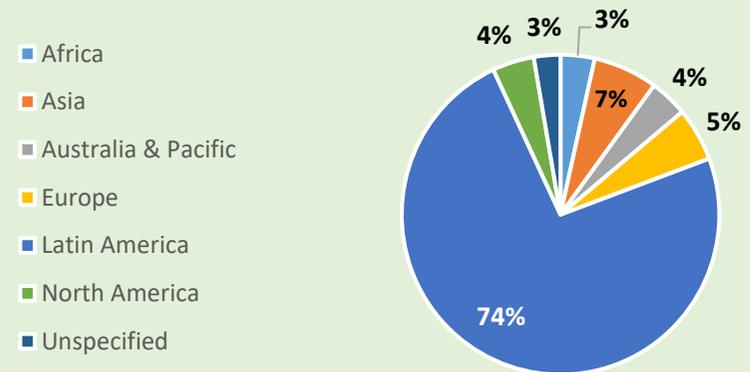
### Overview of participation:

Total number of participants: **259** (152 survey participants; 107 individuals who commented during the webinars, by emails, etc.)

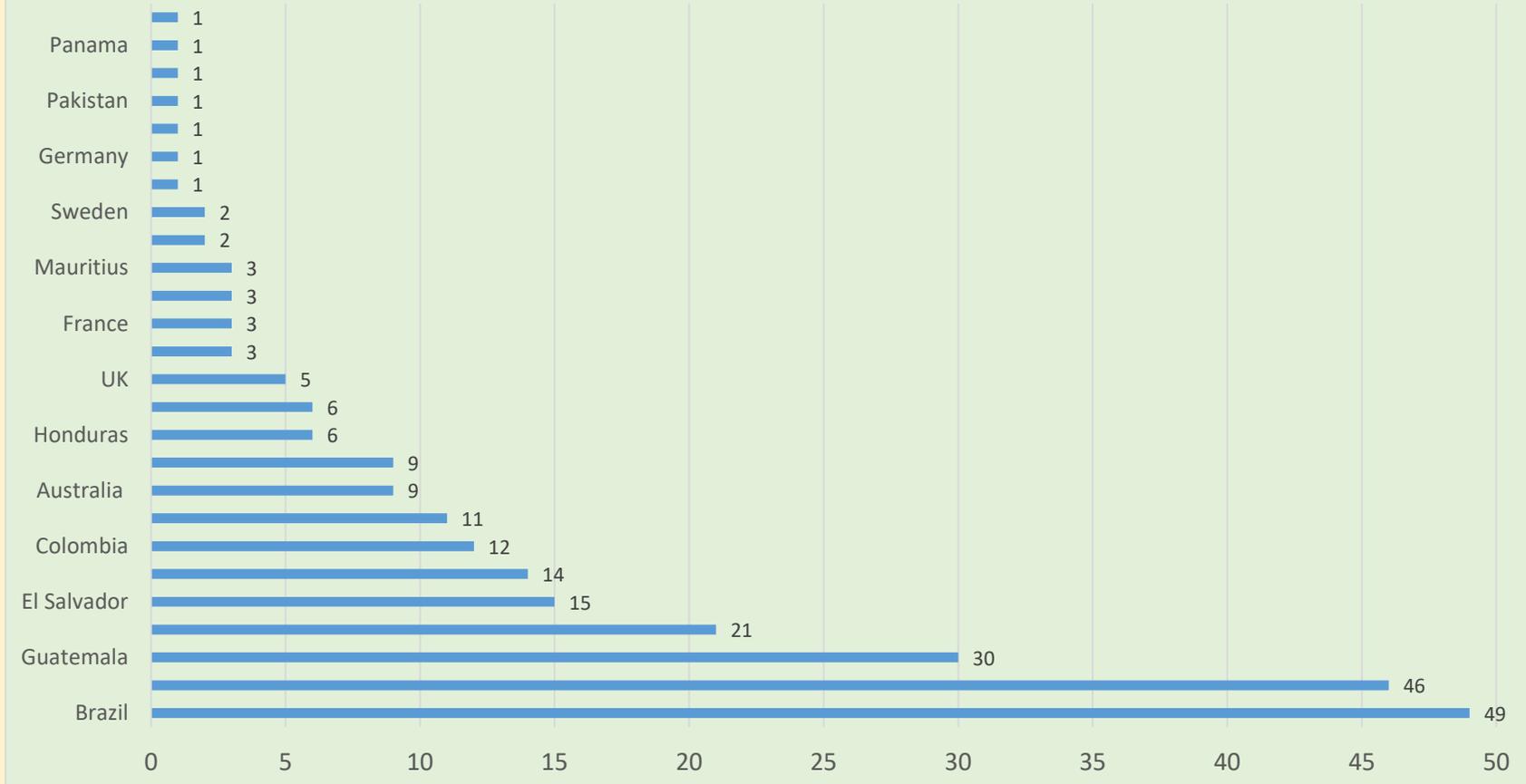
### **Participants' geographical location:**

74% of participants come from Latin America; 7% from Asia (mostly India); 5% from Europe; 4% from the USA and Australia/NZ and Africa respectively. The largest number of participants were from Brazil, Costa Rica and Guatemala (see graph below).

### Participants' geographical location

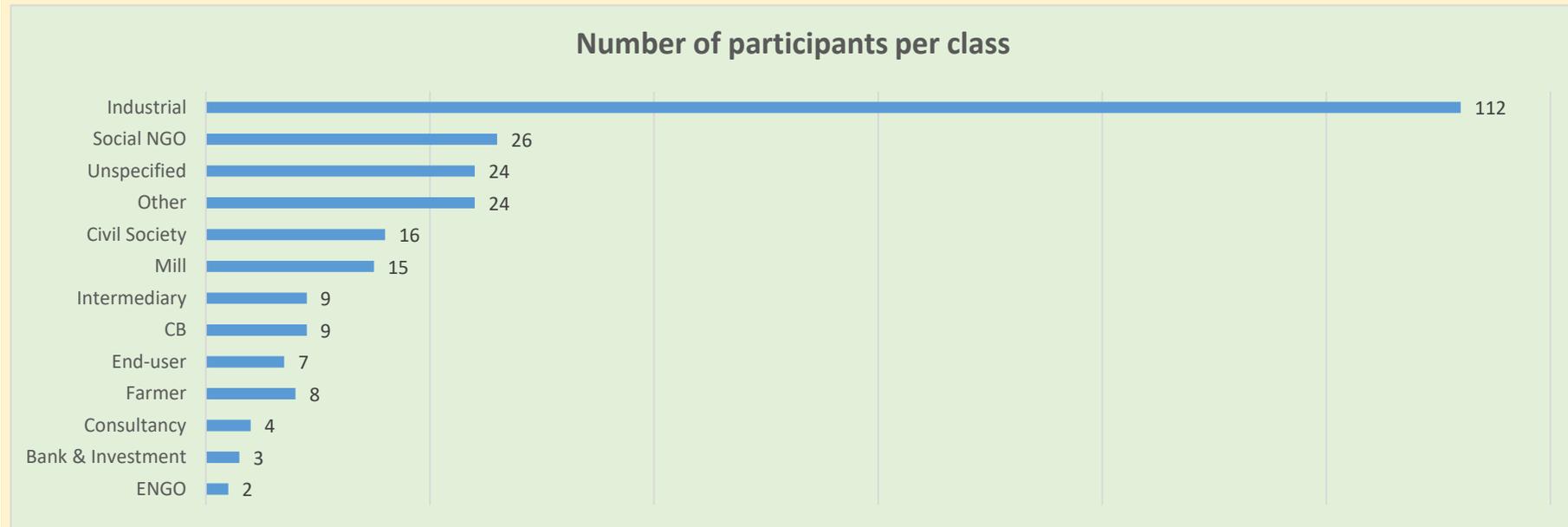


## Number of participants per country



**Class representation:**

The largest proportion of participants represent the Producer class (43%), followed by Social NGOs (10%). 9% of participants have not disclosed their class.



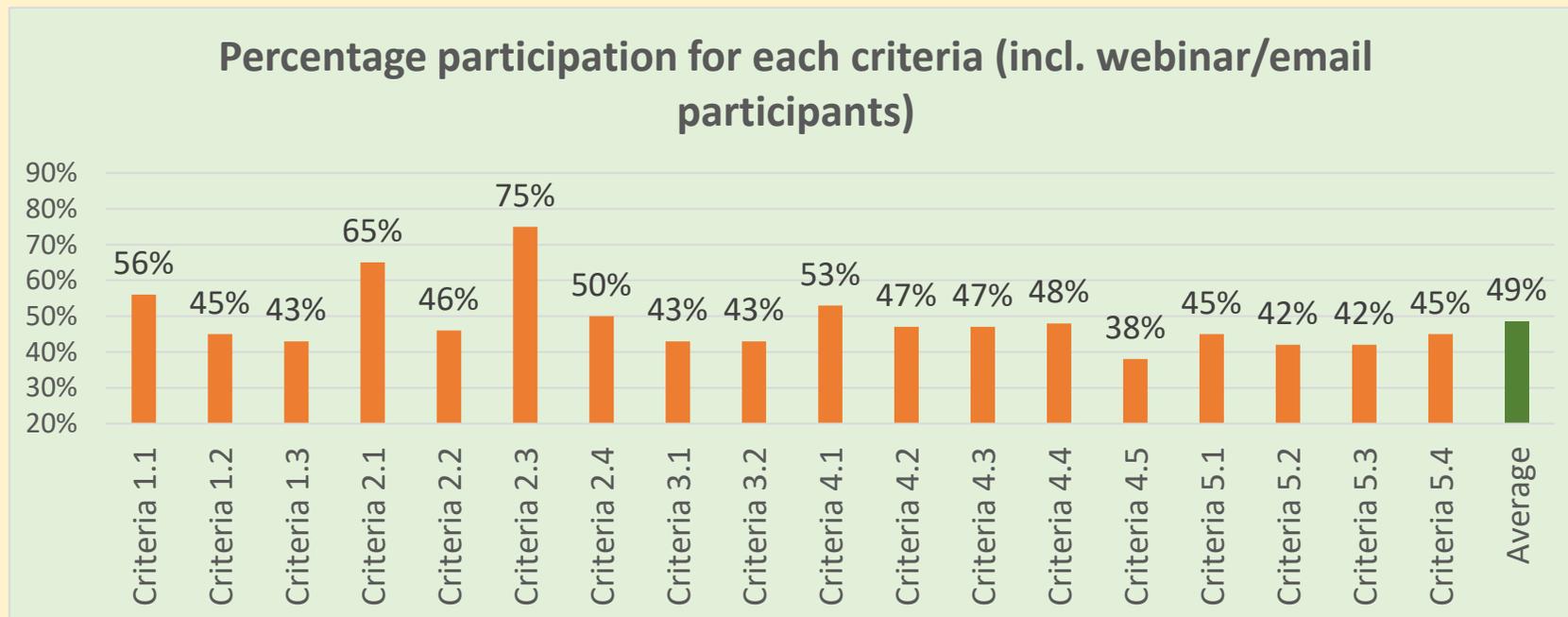
**Membership:**

36% of participants are Bonsucro members while 25% are not. 39% of respondents did not specify their membership status.

**Certification:**

41 Bonsucro-certified members have taken part in this public consultation, most of them representing the Industrial sector. It is worth noting that the biggest proportion of participants from the certifiable classes did not disclose their certification status.

The average response rate throughout the survey stands at 49%. Criteria 2.3 and 2.1 have the highest response rate out of all the criteria, and therefore the highest proportions of comments.



## Overview of overarching comments

The over-arching comments generally fall in the categories described below and are recurring for many criteria and indicators.

## Scope of implementation - Comments from the Public Consultation

The implementation scope, i.e. “whole supply area”, is the biggest concern amongst upstream respondents (and the biggest proportion of comments in general). The majority of the comments requesting for the scope to be limited to the unit of certification comes from industrial and producer classes.

Reasons provided include:

- impossibility to implement given that operators do not control individual farms and plantations within the supply area
- brings on some disproportionately high extra costs and will require extra resources to be dedicated to implementation, all this would also affect small mills in a disproportionate manner
- disincentivises operators to renew their certification and discourages new users from seeking certification
- lack of leverage by the mill and such high demands can cause cane suppliers to sell to other non-certified mills
- lack of structure/capacity of the sugar cane mills and suppliers to implement the necessary management system requirements
- it is not feasible for the mill to carry out internal audits on the farms to demonstrate compliance with the requirements.

Furthermore, how ‘entire supply area’ is defined is currently unclear – will all actors within the supply area be subject to the audit process as well?

However, it should also be noted that the views on this are mixed with the social NGOs generally in agreement that the scope of implementation should be extended to the “whole supply area”.

## Scope of implementation – Response from the SRWG

The following guidance was developed to clarify expectations around the inclusion of the whole cane supplying area in the scope of certain indicators:

In order to meet the stipulation for unit of certification to comprise the entire cane supplying area (Certification Protocol 4.1.1), and to do so in a time-limited frame (Code of Conduct V2, section 2.2 & 3.4 , the Bonsucro Production Standard v5.07 requires operators to develop a

timebound progressive implementation plan (TBPIP) for meeting the requirements in the production standard where the scope specifies applicability to entire cane supplying area.

The TBPIP is challenging, i.e. with a time scale that is as short as possible, taking into account the specific circumstances of the cane supply area (e.g. number of independent smallholders).

As part of the TBPIP development, the operator implements measures and controls progressively, prioritising the highest risk issues and areas to be addressed first.

For third party suppliers, i.e. for parts of the cane supplying area where the operator has no direct jurisdiction, progress with the TBPIP will be evaluated during the audits, i.e. whether measures were implemented as scheduled. The audit will not evaluate compliance with the corresponding requirements by third party suppliers, but only whether the operator carried out the measures of the TBPIP concerning these requirements.

Non-Conformities with TBPIP implementation are raised as follows:

- Isolated lapses in implementation of time bound plan: CBs to issue a minor non-compliance
- Evidence of fundamental failure to proceed with implementation of the plan: CBs to issue a major non-compliance

#### **Going beyond national legislation - Comments from the Public Consultation**

Another recurrent comment touches on the importance of considering country-specific contexts, especially in relation to legal requirements. Particularly there has been calls for the standard to not go beyond the requirements of local legislations.

**Country-specific contexts and the need for National Interpretations – Response from the SRWG**

National legislations are the basis for any sustainability scheme. Voluntary sustainability standards complement national legislation and should sometimes go beyond the national requirements especially when there is a gap between national legislation and international best practice & international frameworks that aim to drive improvement and promote best practices.

Recognising that going beyond national legislation might be challenging, the standard allows for operators to set their own targets and continuously improve at their own pace or in some cases the standard sets a set time frame to implement the requirements of the standard e.g. 5 years for maximum hours of work.

**Lack of guidance - Comments from the Public Consultation**

Another comment that is frequently raised in many sections is a clear need for Bonsucro to provide further guidance for this standard. It was also pointed out that the absence of a guidance document makes it difficult for respondents to adequately assess the new requirements and provide input on the recommendations for implementation. Many felt that the lack of clarity will increase the risk of misinterpretation by both the users and the auditors. Many comments are asking for more guidance to be published about both the methodology to implement the indicators in practice but also guidance for the audit process. Another issue that generated quite a lot of concern is on Living Wage where many felt that the lack of clarity and guidance over how Living Wage is calculated and defined as well as the expectation of closing the wage gap makes it very difficult for them to properly comment on its introduction to the standard. The lack of clarity has also caused some confusion with minimum wage causing some respondents to use the two terms interchangeably in their comments.

**Lack of guidance – Response from the SRWG**

As part of phase II of the Standard Revision Process, implementation guidance has been developed for each indicator, this can be found in Annex 2 of the Standard v.5.7.

**Clarifying how certain key terms are defined - Comments from the Public Consultation**

Similar to the concerns raised about ambiguity caused by the lack of guidance, many comments have also come in requesting for certain terminology to be better defined as it will clarify the scope of applicability. Some examples of where clearer definitions are needed are provided below (more details can be found in the criteria/indicator specific summaries):

- Definition of whole supply area
- Definition of all workers. In the standard they are sometimes mentioned as staff, sometimes workers and other times employees. Usage should be consistent unless there is a difference in application, if so, it should be clearly explained/defined.
- Definition of legitimacy with regards to land tenure
- Definition of vulnerable stakeholders

Definition of progressive implementation. Need clarity on what is meant by progressive, especially regarding timeline.

#### **Clarifying how certain key terms are defined – Response from the SRWG**

Annex 1 of the Standard now includes definitions of key terms.

#### **Lack of consideration for the significant economic implications on the producers - Comments from the Public Consultation**

Many respondents have raised concerns over the high investment cost that is required to implement the new changes especially during this time when many economies are still struggling to recover from the full impacts of COVID-19. Some have also raised that sugar prices remain low and the lack of price differentials for Bonsucro certified sugar make it difficult to justify the business case for some of these investments.

#### **Lack of consideration for the significant economic implications on the producers – Response from the SRWG**

Recognising that due to lack of guidance during the first public consultation, many of the aspects were interpreted differently to what the SRWG had intended (e.g. at no point did the SRWG intend for the ‘whole supply base’ reference to mean that the mill needed to certify the whole supply base, but rather the aim is to develop a timebound progressive implementation plan to engage suppliers in the whole supply base). The added guidance should now help to provide clarity on objectives and expectations and allow for reconsideration of this point.

### **Progressive implementation - Comments from the Public Consultation**

Due to concerns about the cost implications and technical challenges in implementing associated with the new requirements, some respondents have requested a stepwise approach to implementation.

Generally, respondents have asked for more clarity of what “progressive implementation” would entail. Clear guideline on timelines and expectations would be both important to producers and auditors.

### **Progressive Implementation - Guidance drafted by the SRWG in response to comments**

#### **Progressive Implementation**

In order to meet the stipulation for unit of certification to comprise the entire cane supplying area (Certification Protocol 4.1.1), and to do so in a time-limited frame (Code of Conduct, V2, the draft Bonsucro Production Standard V5.7 requires operators to develop a timebound progressive implementation plan (TBPIP) for meeting the requirements in the production standard where the scope specifies applicability to entire cane supplying area.

The TBPIP is challenging, i.e. with a time scale that is as short as possible, taking into account the specific circumstances of the cane supply area (e.g. number of independent smallholders).

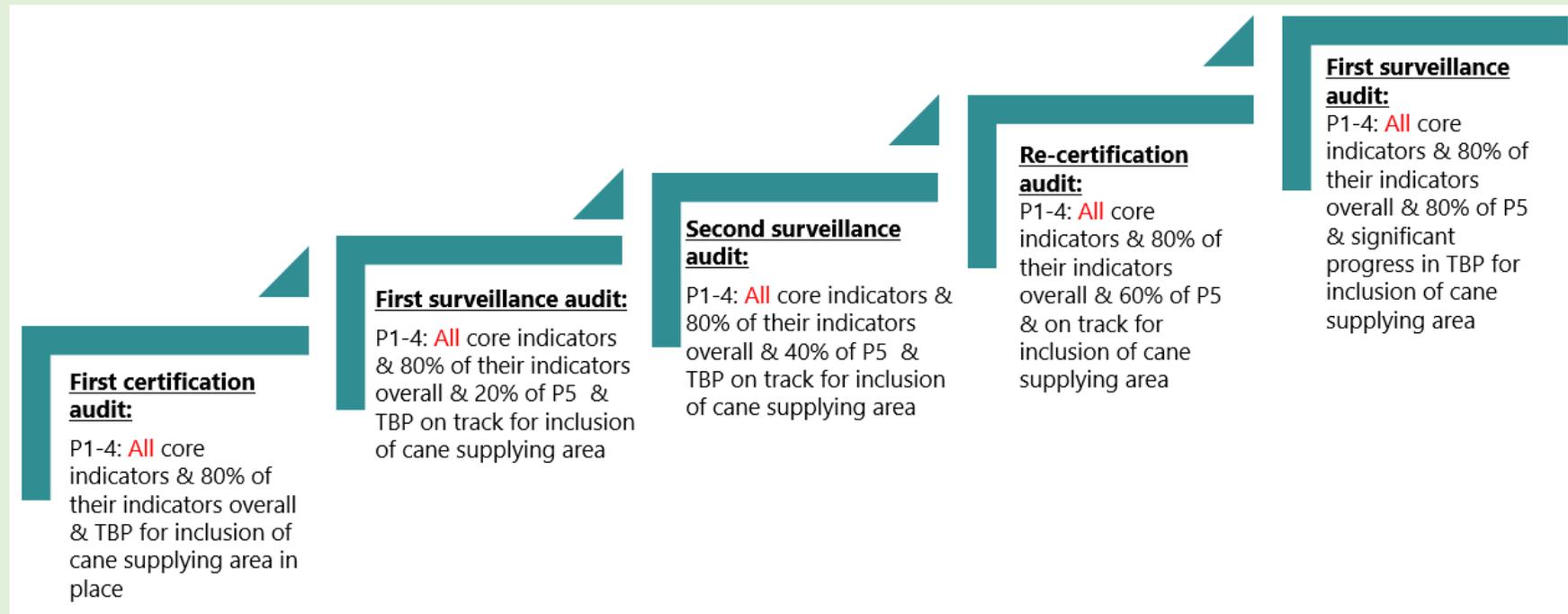
As part of the TBPIP development, the operator implements measures and controls progressively, prioritising the highest risk issues and areas to be addressed first.

For third party suppliers, i.e. for parts of the cane supplying area where the operator has no direct jurisdiction, progress with the TBPIP will be evaluated during the audits, i.e. whether measures were implemented as scheduled. The audit will not evaluate compliance with the corresponding requirements by third party suppliers, but only whether the operator carried out the measures of the TBPIP concerning these requirements.

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- Evidence of fundamental failure to proceed with implementation of the plan: CBs to issue a major non-compliance

See graphic illustration below detailing compliance with this standard and TBPIP :



*NOTE ON RESTRUCTURING OF THE STANDARD*

Many of the comments received also made it clear that the draft standard was not as clear as it could have been. The SRWG decided to address this, amongst other measures, via some restructuring and reordering of criteria/indicators. Please see the table below for summary of changes to numbering with indicators that were added by the SRWG highlighted in green.

V5.01	Number change?	V5.7	Content
1.1.	No change		
1.1.1	No change		
1.1.2	Change	1.2.1	Mapping
1.1.3	Change	1.4.2	Land and water claims
1.1.4	Change	1.2.2	Risk and impact assessment
1.2	Change	1.3	Management plans
1.2.1		1.3.3	Legal compliance
1.2.2	Change	1.3.5 & 1.3.6	Cane supply agreements
1.2.3	Change	1.3.1	Management plans
1.2.4		1.4.1	Corrective actions
1.3		1.4	M&E and grievances
1.3.1		1.4.3	Grievance mechanism
		1.3.2	SOPs
		1.3.4	FPIC
2.1	No change		
2.1.1	No change		
2.1.2	No change		
2.1.3	No change		
2.1.4	No change		
2.1.5	No change		
2.1.6	Change	2.1.7	LTA
2.1.7	Change	2.1.6	First aide and emergencies
2.1.8	Change	2.3.5	Accommodation
2.2	Change	2.3	
2.2.1	Change	2.3.4	Minimum
2.2.2	Change	2.3.3	Debt bondage
2.2.3	Change	2.3.1	Discrimination
2.2.4	Change	2.3.2	Abuse
2.2.5	Change	2.4.1	Unions
2.2.6	Change	2.3.6	Lost working hours

2.2.7	Change	2.2.1	Contracts
2.3	Change	2.2	Working Conditions
2.3.1	Change	2.2.4	Ratio minimum wage
2.3.2	Change	2.2.5	Min. wage piece rate
2.3.3.	Change	2.2.2	Max working hours
2.3.4	Change	2.2.3	Overtime
2.3.5	Change	2.2.6	Living Wage
2.4	No Change		
2.4.1		2.4.3	Grievances
2.4.2	No Change		
3.1 & all indicators	No change		
3.2 & all indicators	No change		
4.1	No change		
4.1.1	No change		
4.1.2	No change		
4.1.3	No change		
4.1.4	Change	4.1.1 (merged with)	Biodiversity & HCV
4.1.5	Change	4.1.4	No expansion
4.1.6	Change	4.1.5	Greenfield expansion
4.2	No change		
4.2.1	No change		
4.2.2	Replaced		
4.2.3	Replaced		
4.2.4		4.2.6	Erosion
4.2.5		4.2.7	Burning
4.2.6	Change	4.2.5	Fertiliser
4.2.7	Replaced		
		4.2.2	Soil Management Plan
		4.2.3	Soil BMPs
		4.2.4	Corrective Actions
4.3 & all indicators	No change		
4.4 & all indicators	No change		
4.5	No change		
4.5.1	No change		
		4.5.2	Training
5.1 & all indicators	No change		

5.2	No change		
5.2.1	No change		
5.2.2		5.2.3	Disposal plan
		5.2.2	Fugitive and point-source air emissions
5.3	No change		
5.3.1	No change		
5.3.2	Removed		
5.4 & all indicators	No change		

### **Colour coding and structure in the next section**

**The comment analysis for each criterion and indicator is shown in the blue boxes on the left side (if any comments were submitted). The response and actions following discussions of the comments is shown in the green boxes on the right side. The text of the earlier draft criteria and indicators is shown above the corresponding blue and green boxes and the subsequent changes and current draft text is shown below.**

#### **'Traffic light' system:**

In the analysis of the comments, each criterion and indicator have been attributed on of the three following colours to facilitate the prioritisation of the next steps of the standard review. *(Note that comments about scope, the need for national interpretations, etc. (see comments above) are not included in this system as they are common to all the criteria)*

- Participants have called for significant changes to be made to this criterion/indicator
- Participants have called for changes to be made, but they should not affect the general intent of the criterion/indicator
- Participants have called for general clarifications and minimal changes to be made

**PRINCIPLE 1 - ASSESS AND MANAGE ENVIRONMENTAL, SOCIAL & HUMAN RIGHTS RISKS**

<b>Previous CRITERION name</b>	<b>1.1 Leadership demonstrated through enactment of commitment, context analysis, stakeholder mapping &amp; risk assessments</b>		
<p><b>General comments from the public consultation – Criteria 1.1</b></p> <ul style="list-style-type: none"> <li>➤ Demand for more guidance to be published about both the methodology to implement the indicators but also guidance for the audit process.</li> <li>➤ The need for proper engagement of actors in positions of leadership and management within the companies was identified as being key to a successful implementation of this standard.</li> <li>➤ Given the identified need for extra financing and resources to put in place the sustainability policies, company's top management must be engaged with and properly trained.</li> </ul>		<p><b>Criteria 1.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Guidance has been developed, including references to top management involvement, included as annex 2 of the standard.</li> <li>➤ This is not specific to standard content and therefore outside of the scope of the SRWG. All comments have been passed on to the Bonsucro Secretariat.</li> </ul>	
<b>New CRITERION name</b>	<b>1.1 Leadership demonstrated through elaboration and implementation of sustainability policies</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			

<p>1.1.1 Sustainability policies are in place</p>	<p>Mill Agriculture  Whole supply area</p>	<p>Yes</p>	<p><b>CORE INDICATOR</b> In line with the scope of application of the Bonsucro Production Standard, the operator shall have policies or work orders in place for respect for human rights, indigenous peoples' rights, labour rights, worker health, environment, the Bonsucro Standard, Anti-Corruption/Anti-Bribery/money laundering, anti-harassment and non-discrimination. The operator shall implement these policies and practices in the unit of certification and progressively implement these in the whole supply area. The operator's commitment shall be made available to personnel, suppliers, clients and other stakeholders. The policies shall clearly state that respect for these values is an active duty involving ongoing due diligence of actual and potential impacts. <i>For further information, see Guidance.</i></p> <p>Guidance: Policy statements are written by area experts within an operation and approved by senior management. Implementation of policies is a process that involves buy-in and engagement across the enterprise to be effectively implemented.</p>
<p><b>Indicator 1.1.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Request for general clarifications on: <ul style="list-style-type: none"> <li>• How does Bonsucro define 'stakeholders' in this context?</li> <li>• Are human rights policy and due diligence process mandatory?</li> </ul> </li> <li>➤ Suggested addition to the scope of the sustainability policy: include aspects of occupational health, occupational safety, environmental protection, relationship with the community, as well as land rights.</li> </ul>		<p><b>Indicator 1.1.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The following clarifications have been included in the standard: <ul style="list-style-type: none"> <li>○ A definition of stakeholders is now included in 'Definitions'.</li> <li>○ Added "stakeholders, with a legitimate interest duly demonstrated" to clarify who has access to the operator's commitment.</li> <li>○ As a core indicator, all requirements presented in the indicator text are mandatory.</li> </ul> </li> <li>➤ The scope of required policies has been extended and strengthened to include policies on occupational health &amp; safety, land rights, social dialogue and ethical conduct.</li> </ul>	
<p>New indicator (post-public consultation with changes made by the SRWG)</p>			

<p>1.1.1 Sustainability policies are in place.</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>Yes</p>	<p>In line with the scope of application and content of the Bonsucro Production Standard, the operator has policies or work orders in place to respect:</p> <ul style="list-style-type: none"> <li>• human rights (including anti-harassment and non-discrimination),</li> <li>• indigenous peoples' rights, community engagement and land rights</li> <li>• labour rights,</li> <li>• occupational health and safety,</li> <li>• environmental protection,</li> <li>• Anti-Corruption/Anti-Bribery/money laundering,</li> <li>• Ethical conduct</li> <li>• Social dialogue</li> </ul> <p>The operator implements these policies and practices in the unit of certification and progressively implements these in the whole cane supplying area. The operator's commitment is made available to personnel, suppliers, clients and other stakeholders, with a legitimate interest duly demonstrated.</p> <p>The policies clearly state that respect for these values is an active duty involving ongoing due diligence of actual and potential impacts.</p> <p><i>For further information, see guidance.</i></p>
<p><b>Previous CRITERION name</b></p>	<p><b>1.2 Management strategies are documented and implemented</b></p>		
<p><b>General comments from the public consultation – Criteria 1.2</b></p> <p>➤ Contradiction present within the standard whereby the indicators in this criterion indicates that compliance with laws is the basis for the requirements, but in later indicators there are requirements that are outside the law and must be met according to the standard. It was suggested that operators:</p> <ul style="list-style-type: none"> <li>○ must firstly comply with the national laws,</li> </ul>			<p><b>Criteria 1.2 – Changes made by the SRWG</b></p> <p>➤ Additional wording in the indicators and guidance has been added to clarify that in cases where operators are required to comply with national laws and the Bonsucro standard, the strictest shall prevail.</p>

<ul style="list-style-type: none"> <li>○ should try and comply fully with Bonsucro standard unless there is a clear contradiction with national law</li> </ul>			
<b>New CRITERION name</b>	<b>1.2 Risks and impacts are systematically assessed</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
1.1.2 - Mapping of Internal, External, and Vulnerable Stakeholders is conducted	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b> The operator shall have an identification, prioritization and engagement plan with interested and affected parties (i.e. internal, external, directly, indirectly impacted, and vulnerable stakeholders, as well as indigenous, tribal and traditional communities). The plan shall be revised at least annually. <i>For further information, see Guidance.</i></p> <p><b>Guidance:</b> The process of engaging with indigenous and tribal communities shall take into consideration ILO Convention 169, guaranteeing indigenous peoples the right to free, prior and informed consent consultation and guaranteeing good faith.</p>
<p><b>Indicator 1.1.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Request for clarifications around the definition of "vulnerable stakeholders" currently too limited to indigenous/tribal communities. The definition should include a wider scope of stakeholders (e.g. "economically vulnerable stakeholders", women, children, etc).</li> <li>➤ Guidance on the proposed methodology stakeholder mapping.</li> </ul>		<p><b>Indicator 1.1.2 – Changes made by the SRWG</b></p> <p><b>Please note that the indicator number has changed from 1.1.2 to 1.2.1</b></p> <ul style="list-style-type: none"> <li>➤ Clarification have been provided on ‘vulnerable stakeholders’: <ul style="list-style-type: none"> <li>○ A definition of ‘vulnerable stakeholder’ has been added to the ‘Definitions’ document.</li> <li>○ The scope of vulnerable stakeholders has been extended to include women and children, migrant workers, contracted workers and indigenous, tribal and traditional communities, as</li> </ul> </li> </ul>	

<ul style="list-style-type: none"> <li>➤ Need for more clarity on the expectations for engagements as engagement with vulnerable communities might be challenging in some areas where communities might not be willing to be engaged with.</li> <li>➤ Concerns that an annual review is too frequent. Suggestions to change it to either every three years or bi-annually.</li> <li>➤ The indicator should also include a rehabilitation plan which is informed by the stakeholder mapping.</li> </ul>	<p>well as economically, socially, culturally or politically vulnerable stakeholders.</p> <ul style="list-style-type: none"> <li>➤ Methodology for stakeholder mapping now included in the new guidance draft (Annex 2 of standard v.5.7).</li> <li>➤ Expectations for engagement: Guidance has been developed and included as annex 2 of the standard.</li> <li>➤ The SRWG has agreed to include an annual revision of the identification, prioritisation and engagement plan as part of the indicator.</li> </ul>
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New indicator (post-public consultation with changes made by the SRWG)

1.2.1 - Mapping of Internal, External, and Vulnerable Stakeholders is conducted  (former 1.1.2)	Mill Agriculture  CORE INDICATOR	Yes	The operator has an identification, prioritization and engagement plan with interested and affected parties (i.e. internal, external, directly, indirectly impacted), including: <ul style="list-style-type: none"> <li>women and children</li> <li>migrant workers</li> <li>Contracted workers</li> <li>indigenous, tribal and traditional communities</li> <li>economically, socially, culturally or politically vulnerable stakeholders</li> </ul> The plan is revised at least annually.  <i>For further information, see Guidance.</i>
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Previous indicator (pre-public consultation)

<p>1.1.4 - Risk and Impact Assessment are conducted</p>	<p>Mill Agriculture</p> <p>Whole supply area</p>	<p>Yes</p>	<p><b>CORE INDICATOR</b></p> <p>The operator must have in place a Risk and Impact Assessment that includes</p> <ol style="list-style-type: none"> <li>(1) A business context analysis &amp;</li> <li>(2) A social and environmental risk analysis &amp;</li> <li>(3) An identification of impacts (potential and actual) on the human rights of workers, environment and communities.</li> </ol> <p>At minimum, the impact assessment must cover the core indicators of the Standard including actual and potential impacts of the operation on the environment, workforce, and communities. A summary shall be made available to personnel, suppliers, clients and other identified stakeholders. The operator shall conduct the assessment for the unit of certification and progressively incorporate the whole supply area. <i>For further information, see Guidance.</i></p> <p>Guidance: The context analysis should consider a range of relevant contextual factors including national/regional financial health, conflict risks, and transportation/logistics challenges, opportunities associated with trade innovations, political stability, social dialog issues, contracting and subcontracting risks, and other facilitators/barriers to doing business. If it determines the context is politically fragile or conflict-affected, the analysis should articulate how the workforce will be protected from violence and what actions the operator will take to avoid contributing to conflict.</p> <p>The social and environmental risk analysis is inclusive of emergency preparedness (e.g. natural/environmental disasters, pandemics, and others), to account for potential effects on workload requirements, workplace risks, and other externalities.</p>
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#### Indicator 1.1.4 – Comments from the public consultation



- Concern that sharing the risk assessment information with non-legitimate stakeholders could have damaging effects on companies' reputation and business. As such, there is a need to consider closely the legitimacy of the stakeholders which would have access to the analysis and assessment reports.
- Proposition to remove the business context analysis as this information should not be included in the risk assessment.
- Need for a better-defined methodology with a suggestion that Bonsucro could provide access to a standardised high-level business/social and environmental risk assessment.
- Suggestion that the indicator should also require operators to present an action plan to counteract identified negative impacts and enhance positive ones.
- Clarifications were requested on:
  - Whether the analysis should be done at the micro or macro level;
  - What are considered 'possible impacts' and 'actual impact';
  - whether the implementation timeline is decided by the producers/operators or by Bonsucro.

#### Indicator 1.1.4 – Changes made by the SRWG

*Please note that the indicator number has changed from 1.1.4 to 1.2.2*

- The text now includes the mention of “personnel, suppliers, clients and **other parties who have a duly demonstrated legitimate interest**”.
- Guidance around business context analysis has been developed and included as annex 2 of the standard.
- Methodology for conducting a risk assessment has been developed and included as annex 2 of the standard.
- Indicator 1.3.2 (Management Plans are developed) now requires operators to have management plans in place which “have the intention to counteract identified negative impacts and enhance positive ones”.
- The following clarifications have been included:
  - Definitions of ‘possible’ and ‘actual’ impacts have been added to the guidance
  - Implementation timeline: This is decided as part of the TBPIP.

New indicator (post-public consultation with changes made by the SRWG)			
1.2.2 - Risk and Impact Assessment are conducted  (former 1.1.4)	Mill Agriculture  CORE INDICATOR  Whole cane supplying area	Yes	The operator has in place a Risk and Impact Assessment that includes (1) A social and environmental risk analysis & (2) An identification of impacts (potential and actual) (3) A business context analysis  A summary is made available to personnel, suppliers, clients and other parties who have a duly demonstrated legitimate interest.  <i>For further information, see Guidance.</i>
<b>Previous CRITERION name</b>	<b>1.3 Engagement Mechanisms are in place</b>		
<b>Criteria 1.3 – Changes made by the SRWG</b>			
Criterion 1.3 previously only covered one indicator (1.3.1), as such the comments received from the public consultation on 1.3 are addressed as part of indicator 1.3.1, now indicator 1.4.3 following the restructuring of Principle 1.			
<b>New CRITERION name</b>	<b>1.3 Systems for addressing risk and implementation of these systems are in place</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
1.2.3 – Objectives and plans are set to control for highest identified risks	Mill Agriculture  Whole supply area	Yes	CORE INDICATOR The operator shall establish objectives to control the highest risks identified related to indicators of the Bonsucro Production Standard in the unit of certification and work progressively to implement these in the whole supply area to achieve 100%. The operator shall demonstrate that adequate resources and competent personnel (with capacity to address environmental, social, human rights, labour, OHS and other concerns) are allocated to manage identified risks. A summary shall be made available to personnel, suppliers, clients and other stakeholders. <i>For further information, see Guidance.</i>

			<p>Guidance Where indigenous and traditional communities are identified, free, prior and informed consent (FPIC) will be required before any operations are established or expanded.</p>
<p><b>Indicator 1.2.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Need for more clarification and guidance on: <ul style="list-style-type: none"> <li>○ proposed methodology to implement the indicator.</li> <li>○ what determines the “highest risk” - how is this decided and who decides it</li> <li>○ what level of details are operators required to provide</li> </ul> </li> <li>➤ Confusion around the difference between indicators 1.1.4 and 1.2.3 - Where does the first one end and the other begin? It seems redundant to have both.</li> <li>➤ Suggestion to include a Hierarchy of Risk Control (eliminate, replace, engineering controls, administrative controls, etc.), as a logical order to control risks.</li> </ul>		<p><b>Indicator 1.2.3 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 1.2.3 to 1.3.1</i></p> <ul style="list-style-type: none"> <li>➤ Clarifications: <ul style="list-style-type: none"> <li>○ Methodology for implementation has been included in the guidance.</li> <li>○ Definition and guidance on how to identify ‘highest risk’ has been included in the guidance</li> <li>○ For levels of detail please refer to guidance</li> </ul> </li> <li>➤ Indicator text has been amended to clarify linkages between indicator 1.2.3 (now 1.3.2) and other indicators throughout the standard.</li> <li>➤ Hierarchy of Risk Control now included in the guidance.</li> <li>➤ The indicator’s name has been changed to put more emphasis on developing and implementing Management Plans.</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>1.3.1 Management Plans are developed and Implemented.</p>	<p>Mill Agriculture  CORE INDICATOR</p>	<p>Yes</p>	<p>The operators shall develop and implement mitigative measures to counteract the highest risks identified in the risk and impact assessment (1.1.4) and to implement the rests of the Bonsucro Production Standard.</p>

(partially former 1.2.3)	Whole cane supplying area		<p>The operator demonstrates that adequate resources and competent personnel are allocated to manage identified risks.</p> <p>Priorities will be given to control the highest risks identified related to indicators of the Bonsucro Production Standard in the unit of certification and work progressively enact actions that will seeks to mitigate in the whole cane supplying area.</p> <p><i>For further information, see guidance.</i></p>
<p><b>NEW indicator</b></p> <p>The SRWG has elected to include an indicator for the development of Standard Operating Procedures for all activities within the unit of certification.</p>			
1.3.1 Standard Operation Procedures are developed	Mill Agriculture	Yes	The operator develops and implements Standard Operating Procedures for all activities of the operation.
<p><b>Previous indicator (pre-public consultation)</b></p>			
1.2.1 - Systems in place to demonstrate compliance with applicable laws, commitments, rights & other requirements.	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b></p> <p>The operator must have a documented system in place to identify, update track &amp; promote compliance with applicable laws, commitments, rights and requirements.</p> <p>The operator must also list and evidence legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p><i>For further information, see Guidance.</i></p> <p>Guidance: Applicable laws, commitments, rights and requirements refers to laws (including ratified and integrated international conventions), pertinent to the scope of application of the Bonsucro Production Standard. This indicator is specific to laws on:</p> <ul style="list-style-type: none"> <li>- Waste, pollution &amp; environmental protection,</li> <li>- Nature conservation &amp; natural ecosystems,</li> <li>- Water quality &amp; extraction</li> </ul>

			<ul style="list-style-type: none"> <li>- Energy &amp; GHG emission,</li> <li>- Labour conditions, including occupations H&amp;S</li> <li>- Operational licenses,</li> <li>- Social benefits/obligations</li> <li>- Human rights and traditional community rights</li> <li>- Land and water title and -use rights,</li> <li>- Soil protection</li> <li>- Agricultural and processing practices, transportation.</li> </ul> <p>Note that in some cases, the Standard can go beyond the national laws and in such cases, the Standard shall prevail. If the Bonsucro Standard and national law conflict, the operators shall seek ways to honour the principles of the Bonsucro Production Standards wherever possible; Where the domestic context renders it impossible to meet this responsibility fully, operators are expected to respect the principles of the Bonsucro Production Standard to the greatest extent possible in the circumstances, and to be able to demonstrate their efforts in this regard.</p>
<p><b>Indicator 1.2.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Need to push this indicator further as currently there is no guarantee of compliance and would require an auditing process to be in place. NGO respondents, in particular, have been requiring that an element of proof of compliance is added to the indicator.</li> <li>➤ Further clarifications needed on: <ul style="list-style-type: none"> <li>➤ scope of 'applicable laws</li> <li>➤ scope/coverage of 'systems' cover</li> <li>➤ types of rights referred to in this indicator</li> </ul> </li> </ul>			<p><b>Indicator 1.2.1 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 1.2.1 to 1.3.3</i></p> <ul style="list-style-type: none"> <li>➤ A Bonsucro audit is not a legal enforcement audit and is not to be used to determine if an operator is complying with the law. The Bonsucro's standard is seen as a driver and enabling factor to drive compliance with local legislation. During the audit process, auditors will conduct verification of the efficiency of this system, which would include verification of actual compliance with legal requirements.</li> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ Further clarifications on scope of applicable laws, systems and types of rights have been included in the guidance (see annex 2 of the standard)</li> </ul>

New indicator (post-public consultation with changes made by the SRWG)			
1.3.3 - Systems in place to demonstrate compliance with applicable laws, commitments, rights & other requirements.  (from previous 1.2.1)	Mill Agriculture  CORE INDICATOR	Yes	The operator has a documented system in place to identify, update track & promote compliance with applicable laws, commitments, rights and requirements. The operator also lists and provides evidence for legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.  <i>For further information, see Guidance.</i>
<b>New indicator</b>			
This indicator has been added to the standard to reflect feedback from the public consultation pushing for the inclusion of a specific FPIC requirement in the standard.			
1.3.4 Use of land and resources does not diminish rights of other users without their FPIC	Mill and Agriculture	No	Documents showing identification and assessment of demonstrable legal, customary and user rights are available. Free prior and informed consent (FPIC) is obtained following a comprehensive process as detailed in the guidance.  <i>For further information, see guidance.</i>
Previous indicator (pre-public consultation)			
1.2.2 - Cane Supply Agreements complied with	Mill	Yes	CORE INDICATOR All terms of cane supply agreements are complied with, including payments which shall be made according to contractual agreement (including value and timing of payment). <i>For further information, see Guidance.</i>
<b>Indicator 1.2.2 – Comments from the public consultation</b>			<b>Indicator 1.2.2 – Changes made by the SRWG</b>
<ul style="list-style-type: none"> <li>➤ Requests for clearer guidance on: <ul style="list-style-type: none"> <li>○ who are the cane supply agreements made with</li> </ul> </li> </ul>			<i>Please note that the indicator number has changed from 1.2.2 to 1.3.5</i>

<ul style="list-style-type: none"> <li>○ whether the contract is verbal or written. Note that written would be more easily verifiable</li> <li>○ expected % compliance</li> </ul> <p>➤ Identified opportunity for Bonsucro to mandate the inclusion of specific clauses in contracts, such as: provision of water to cane cutters, provision of PPE, provision of sanitary services, etc</p>		<p>➤ Following discussions within the SRWG, this indicator has been split into two (1.3.5 &amp; 1.3.6).</p> <ul style="list-style-type: none"> <li>○ 1.3.5 focuses on payments made according to contractual agreements</li> <li>○ 1.3.6 focuses on inclusion of sustainability requirements in contracts</li> </ul> <p>➤ Note that the guidance is yet to be developed for this indicator</p>	
New indicator (post-public consultation with changes made by the SRWG)			
1.3.5 - Cane Supply Agreements complied with (former 1.2.2)	Mill Agriculture  CORE INDICATOR	Yes	Payment shall be made according to contractual agreement (including value and timing of payment).  <b>Guidance tbd.</b>
<p><b>New indicator</b></p> <p>This indicator has been added to the standard to reflect feedback from the public consultation pushing for the inclusion of mandating specific clauses in contracts and following discussions within SRWG who had previously tried to integrate this with 1.3.5 and were advised to have a singular auditable topic per indicator.</p>			
1.3.6 Cane supply contracts contain sustainability requirements. (former 1.2.2)	Mill	Yes	The operator ensures that cane supply agreements contain requirements geared towards worker and environmental protections (e.g. provision of water to cane cutters, provision of PPE, provision of sanitary services). The operator establishes a control system to measure and monitor supplier compliance with the requirements in the cane supply agreements.  <i>For further information, see guidance.</i>

<b>NEW CRITERION</b>	<b>1.4 – Systems for Monitoring and Evaluation (M&amp;E) and Grievances are implemented.</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
1.2.4 Corrective actions are implemented and management review conducted	Mill Agriculture  Whole supply area	Yes	<p>The organisation shall conduct an annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>- Conforms to the requirements in the Bonsucro Production Standard</li> <li>- Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall direct corrective actions to be taken. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organisation shall maintain the internal audit records and reports.</li> <li>- Corrective actions taken as a result of any nonconformities identified in the internal audit shall be documented, including dates and descriptions of actions taken to resolve them.</li> <li>- The procedure for the annual internal audit process shall be documented.</li> </ul> <p>The internal audit should be conducted in the unit of certification and work progressively to include the entire supply area to achieve 100%. The monitoring mechanism must include a feedback function to workers, giving them the opportunity to comment. <i>For further information, see Guidance.</i></p>
<b>Indicator 1.2.4 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Strong push from social NGOs for this indicator to become a core indicator.</li> <li>➤ Several suggestions for this indicator:</li> </ul>			<b>Indicator 1.2.4 – Changes made by the SRWG</b> <p><b><i>Please note that the indicator number has changed from 1.2.4 to 1.4.1</i></b></p> <ul style="list-style-type: none"> <li>➤ Following discussions, the SRWG has elected to not make this a core indicator.</li> </ul>

<ul style="list-style-type: none"> <li>○ The objectives and plans in 1.2.3 are set up to address those risks mentioned in 1.1.4. The corrective actions in 1.2.4 should be produced and implemented when these objectives and plans identified in 1.2.3 are not met.</li> <li>○ Consider an employee committee to discuss plans and objectives and helping to progress in implementation.</li> <li>○ Recommendation to complete the phrase “The internal audit must be carried out in the certification unit and work progressively until including the supply area and reaching 100%.” with the following “The internal audit must be carried out in the certification unit and work progressively until including the supply area and reaching 100% of the requirements applicable to the itself. ”</li> <li>○ The indicators should be renamed as "internal audit system and continuous improvement".</li> </ul>	<ul style="list-style-type: none"> <li>➤ The indicator text has been amended to make clear reference to other indicators within the Standard. The operator must effectively implement all actions as stipulated in the various procedures (see new indicator 1.3.2 SOP) and management plans (see 4.1.1 BMP and 1.3.1)</li> <li>➤ See SRWG Guidance on timebound progressive implementation plan for more details on how operators are expected to progressively include the whole cane supplying area</li> <li>➤ The name and content of the indicator have changed to put more emphasis on monitoring mechanisms rather than corrective actions.</li> </ul>
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New indicator (post-public consultation with changes made by the SRWG)

<p>1.4.1 Corrective actions are implemented and management review conducted</p> <p>(former 1.2.4)</p>	<p>Mill Agriculture</p> <p>Whole cane supplying area</p>	<p>Yes</p>	<p>The organisation conducts an annual internal audit to determine whether the organisation.</p> <ul style="list-style-type: none"> <li>➤ Conforms to the requirements in the Bonsucro Production Standard</li> <li>➤ Effectively implements and maintains the standard requirements within its organisation, i.e., implements all actions as stipulated in the various procedures (see 1.3.1 SOP) and management plans (see 4.1.X BMP, ....)</li> </ul> <p>The organisation maintains the internal audit records and reports.</p> <p>The internal audit is conducted in the unit of certification and the operator works progressively to include the entire cane supplying.</p> <p><i>For further information, see Guidance.</i></p>
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Previous indicator (pre-public consultation)

<p>1.1.3 Land &amp; water claims that are legitimately contested by other users</p>	<p>Mill Agriculture Whole supply area</p>	<p>0 has &amp; 0 / m3</p>	<p><b>CORE INDICATOR</b> The operator which is involved in legal action, either as claimant or defendant, shall take appropriate actions to resolve the conflict. The operator shall resolve and conform to any justice court case, court rulings, or appeals. The operator shall act toward the definitive settling of the dispute using recognized judicial and/or non-judicial mechanisms. Claims against land and water are applicable to the entirety of the supply area (mill) or production area (farms), irrespective of inclusion in the unit of certification. <i>For further information, see Guidance.</i></p> <p>Guidance: There are various means by which legal, extra-legal, community based, and other socially-appropriate protocols may demonstrate that the settlement of the dispute has been reached. A recognised judicial or non-judicial grievance mechanism can be a national or international court of law, an international grievance mechanism such as the OECD National Contact Point, or a mechanism through investors or MSIs including the grievance mechanisms of international lenders (E.G. IFC CAO). Where judicial rulings benefit the operator to the detriment of traditional communities, the operator shall establish engagement processes with displaced populations, implement a livelihood impact management plan, and track livelihood outcomes and mitigate and/or reverse all adverse impacts of displacement.</p>
<p><b>Indicator 1.1.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests for more guidance on how this indicator will handle cases where documentation is required, but renewal can take upwards of 5 years. Would Bonsucro accept proof of submission as sufficient?</li> <li>➤ Suggestion to have a third-party brought in to mitigate and facilitate dialogue around land use conflicts to make sure that neutrality is kept.</li> <li>➤ The scope of legal actions that are being considered needs clarifying as certification might be delayed in cases where unrelated legal actions are put forward.</li> </ul>		<p><b>Indicator 1.1.3 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 1.1.3 to 1.4.2</i></p> <ul style="list-style-type: none"> <li>➤ More details on the scope of legal actions can be found in the guidance (see Annex 2 in the Standard).</li> <li>➤ Indicator 1.3.4 Use of land and resources does not diminish rights of other users without their FPIC now requires that the operator have an obligation, prior to any contesting of land/water claims (and any other land and resources) by indigenous populations, to make every effort not to violate or make demands on land and water use rights and privileges that belong to indigenous communities.</li> </ul>	

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| <ul style="list-style-type: none"> <li>➤ The definition of "legitimacy" should be confirmed by land tenure experts rather than by users/operators.</li> <li>➤ Suggestion that the indicator could include the need for the operator to present a plan of reparative or compensatory actions to the parties involved in the claim contest. The indicator should require that the operator have an obligation, prior to any contesting of land/water claims by indigenous populations, to make every effort not to violate or make demands on land and water use rights and privileges that belong to indigenous communities.</li> <li>➤ Some changes to the text were proposed:             <ul style="list-style-type: none"> <li>○ Delete: "Where judicial rulings benefit the operator to the detriment of traditional communities, the operator shall establish engagement processes with displaced populations, implement a livelihood impact management plan, and track livelihood outcomes and mitigate and/or reverse all adverse impacts of displacement"</li> <li>○ Proposed new wording: "Guarantees to the right to water for local communities and family farming should be monitored and claims for land and water that are contested by other users should be investigated. Land and water apply to the entire supply area (plant) or production area (farms), regardless of inclusion in the certification unit. The operator involved in the lawsuit, whether as plaintiff or defendant, will take appropriate measures to resolve the conflict. The operator will resolve and adapt to lawsuits, court decisions or appeals. The operator will act aiming at the definitive solution of the dispute using recognized judicial and / or extrajudicial mechanisms. If judicial decisions benefit</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>➤ The SRWG has received the proposed changes proposed from the public consultation and has elected to retain the original text with the addition of "The operator works progressively to include (and/or check) the entire cane supplying area."</li> <li>➤ For requirements directly related to FPIC, please refer to new indicator 1.3.4 Use of land and resources does not diminish rights of other users without their FPIC.</li> </ul> |
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<p>the operator to the detriment of traditional communities, the operator will establish processes of involvement with displaced populations, implement a livelihood impact management plan, and monitor the results in terms of livelihood and mitigate and / or reverse all adverse impacts of the displacement."</p> <ul style="list-style-type: none"> <li>○ Add a process of FPIC from stakeholders involved in land and water use</li> <li>○ Scope should extend to sustainability and regenerative opportunities</li> </ul>			
New indicator (post-public consultation with changes made by the SRWG)			
<p>1.4.2 Land &amp; water claims that are legitimately contested by other users</p> <p>(former 1.1.3)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>0 has &amp; 0 / m3</p>	<p>The operator which is involved in legal action, either as claimant or defendant, takes appropriate actions to resolve the conflict. The operator resolves and conforms to any justice court case, court rulings, or appeals. The operator acts toward the definitive settling of the dispute using recognized judicial and/or non-judicial mechanisms.</p> <p>Claims against land and water are applicable to the entirety of the cane supplying area (mill) or production area (farms), irrespective of inclusion in the unit of certification.</p> <p>The operator works progressively to include (and/or check) the entire cane supplying area.</p> <p><i>For further information, see Guidance.</i></p>
Previous indicator (pre-public consultation)			
<p>1.3.1 - Grievance mechanism for communities are in place</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p>To ensure that affected stakeholders have access to processes that address their grievances, the operator must have in place a mutually agreed on and documented grievance mechanism that meets the expectations laid out in the UN Guiding Principles for Business and Human Rights: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement. In practice it meets the following:</p> <ul style="list-style-type: none"> <li>- It ensures anonymity of complainants where requested by complainants, protecting them from risk of reprisal or intimidation. It also safeguards against nondisclosure rules set by the company.</li> <li>- Procedures are in place to ensure that the system is effectively communicated to and understood by the affected parties, including by illiterate parties or workers whose native language is not the operation's language.</li> </ul>

			<ul style="list-style-type: none"> <li>- The operators keep parties to a grievance informed of its progress, timeframe and outcomes.</li> <li>- The system allows for complainants to choose individuals or groups to support them and/or act as observers.</li> </ul> <p><i>For further information, see Guidance.</i></p> <p>Guidance: A grievance log is published annually, summarizing all complaints fielded by the operation (anonymizing complainants and defendants as appropriate), identifying strategies to expand access/buy-in to the complaint mechanism, and describing interventions planned to address potential root-causes of existing complaints in a systematic manner.</p>
<p><b>Indicator 1.3.1 – Comments from the public consultation</b></p> <p>Indicator 1.3.1 received a lot of support from a majority of the respondents who view it as being a very important part of the standard.</p> <ul style="list-style-type: none"> <li>➤ General ask for more guidance on the methodology for implementation - what exactly needs to be published and to whom? What scope of complaints is to be considered? In the case of group certification, is there a need for individual reporting mechanism for each producer or only one for the group manager?</li> <li>➤ Push for a better inclusion of indigenous/tribal communities in this indicator. There is a need for more proactive measures to be in place, especially for these communities. As such, the mechanism <b>MUST</b> be FPIC-compliant.</li> <li>➤ Need to make the response time shorter in order to effectively deal with grievances and complaints.</li> </ul>			<p><b>Indicator 1.3.1 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 1.3.1 to 1.4.3</i></b></p> <ul style="list-style-type: none"> <li>➤ For more details on methodology for implementation please refer to the implementation guidance (see Annex 2 in the Standard). <ul style="list-style-type: none"> <li>○ Guidance text included complying with FPIC</li> <li>○ Guidance text included response times</li> <li>○ Guidance text included publication and disclosure</li> <li>○</li> </ul> </li> <li>➤ The SRWG has drafted a new FPIC indicator (indicator 1.3.4) to reflect the need for a better inclusion of indigenous and local community rights in the standard.</li> </ul>

<ul style="list-style-type: none"> <li>➤ Importance of the grievance panel having representation from all stakeholder groups to ensure impartial resolutions was highlighted.</li> <li>➤ Question raised on whether these mechanisms provide an independent eye on the issue, or is it allowing companies to review and decide on their own whether a community complaint is valid?</li> <li>➤ Concerns that an annual publication is unrealistic and creates risks and other unintended consequences especially in small communities.</li> <li>➤ Concerns that publishing a grievance log could create reputational damage. Even if kept anonymous there could be legal ramifications if the person could be identified and prosecuted if the information is wrong. Many sites are located in remote areas and anonymity is difficult to guarantee when it is a small and closed community.</li> <li>➤ Requests for this indicator to become a core indicator.</li> </ul>	
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New indicator (post-public consultation with changes made by the SRWG)			
1.4.3 - Grievance mechanism for communities are in place  (former 1.1.3)	Mill Agriculture	Yes	<p>To ensure that affected stakeholders have access to processes that address their grievances, the operator has in place a mutually agreed on and documented grievance mechanism that meets the expectations laid out in the UN Guiding Principles for Business and Human Rights: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement. In practice it meets the following:</p> <ul style="list-style-type: none"> <li>- It ensures anonymity of complainants where requested by complainants, protecting them from risk of reprisal or intimidation. It also safeguards against nondisclosure rules set by the company.</li> </ul>

			<ul style="list-style-type: none"> <li>- Procedures are in place to ensure that the system is effectively communicated to and understood by the affected parties, including by illiterate parties or workers whose native language is not the operation's language.</li> <li>- The operator keeps parties to a grievance informed of its progress, timeframe and outcomes.</li> <li>- The system allows for complainants to choose individuals or groups to support them and/or act as observers.</li> </ul> <p><i>For further information, see Guidance.</i></p>
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## PRINCIPLE 2 - RESPECT LABOUR RIGHTS & OCCUPATIONAL SAFETY AND HEALTH STANDARDS

CRITERION	2.1 To provide a safe and healthy working environment in workplace operations	
<p><b>General comments from the public consultation – Criteria 2.1</b></p> <ul style="list-style-type: none"> <li>➤ Lack of detailed guidance restricted the ability for respondents to provide adequate feedback.</li> <li>➤ Lack of specific health and safety safeguards specifically for women - there should be some tailored around pregnant and lactating mothers, maternity leave, childcare needs and areas women are prohibited from working in such as with pesticides when pregnant or nursing.</li> </ul>		<p><b>Criteria 2.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Guidance has been developed and included as annex 2 of the standard.</li> <li>➤ The SRWG have reviewed the standard draft with a 'gender lens' to strengthen the requirements and make them more gender inclusive.</li> <li>➤ The SRWG has now included a list of definitions to accompany the standard.</li> </ul>

➤ Need for more clarity on several definitions used in the document.			
INDICATOR	Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)			
2.1.1. Main health and safety risks are documented, assessed, communicated to workers, and mitigated	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and farms included in the unit of certification. Health &amp; Safety Assessments must adhere to relevant standards (legislation, policy, and best practice) with regards to ensuring that employment does not jeopardize the health or safety of employees. Health and safety risks will be assessed with regards to occupational risks (e.g. ergonomics, work-related injury and work-related accidents, fatigue), environmental risks (e.g. heat stress, altitude sickness) and pre-existing health risks (e.g. declining kidney function, HIV/AIDS seropositivity) <i>For further information, see Guidance.</i></p> <p><b>Guidance:</b> 'Occupational screening will cover risks associated with job start-up (e.g. risks associated with inadequate acclimatization), job duration (e.g. fatigue, chemical exposure, ergonomics, injury risks to workers in transportation to/from job sites), and job insecurity (e.g. hiring for one task and being reassigned to others without proper screening, training or modified rest regimes). Environmental screening will cover all relevant climatic conditions affecting worker welfare including heat and humidity. Where laws and regulations are sufficiently protective, operators shall adhere to law and make available assessment and monitoring reports and relevant data (see, e.g. Brazil's PPRAs). Where regulations do not result in auditable environmental analyses, operators will conduct assessments in line with global best practice (See Guidance). In evaluating heat stress risk, operators must either employ NIOSH methodology for rest times associated with WGBT heat indices or adhere to the rest schedule provided in guidance. Medical screening, including pre-employment medical screening, will not be used to discriminate against and / or exclude individuals experiencing ill health from employment, but rather to assure that the individual meets the inherent requirements of the position, and identify chronic illnesses that threaten their long-term health status under the relevant working conditions. Workers with identified chronic illnesses will be counselled and referred for medical intervention; work-related illnesses and injuries will be detected and monitored, and hazard control measures will be updated and monitored for effectiveness. Worker health status should be preserved in order to allow them to remain economically active (provide for themselves and their families) to the extent possible and reassigned to alternative positions as needed.</p>

			Where regulations do not result in detailed assessment reports, operators will assess occupational risks in line with the recommendations ILO Convention 184.
<b>Indicator 2.1.1 – Comments from the public consultation</b>			<b>Indicator 2.1.1 – Changes made by the SRWG</b>
<ul style="list-style-type: none"> <li>➤ The current wording of "all workers on the premises of the farm included in the unit of certification" is ambiguous and can refer to permanent and temporary workers.</li> <li>➤ Requests for clear guidance on health and safety risk assessment with regards to environmental risks, such as a clear stipulation of the methodology to use in the calculation of heat stress or acceptable rest time.</li> <li>➤ Lack of clarity on when national or international law applies.</li> </ul>			<ul style="list-style-type: none"> <li>➤ The standard now includes a definition for ‘all workers’ and covers all workers present within the unit of certification including permanent and temporary workers.</li> <li>➤ The guidance now includes the methodology for H&amp;S assessments including for details on heat stress and rest time (see guidance in annex 2 of the standard).</li> <li>➤ Mental and cognitive health has been added to the indicator’s scope</li> <li>➤ Standard requirements or legislation applies (whichever is more stringent).</li> </ul>
New indicator (post-public consultation with changes made by the SRWG)			
2.1.1. Main health and safety hazards and risks are identified, documented, assessed, communicated to workers, and mitigated.	Mill Agriculture  CORE INDICATOR	Yes	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Health &amp; Safety Assessments adhere to relevant standards (legislation, policy, and best practice) with regards to ensuring that employment does not jeopardize the health or safety of employees. Health and safety hazards and risks will be assessed with regards to occupational risks (e.g. ergonomics, work-related injury and work-related accidents, fatigue, workload), environmental risks (e.g. heat stress, altitude sickness) and pre-existing medical (e.g. declining kidney function, HIV/AIDS seropositivity), and mental and cognitive health issues (e.g. PTSD from victimisation/harassment; cognitive capabilities affecting attention/comprehension). Assessment is ongoing/repeated to incorporate changing conditions (e.g. infectious agents, emerging vector-borne illnesses and injuries) and implements responsive and evolving mitigation measures.</p> <p><i>For further information, see Guidance.</i></p>
Previous indicator (pre-public consultation)			

<p>2.1.2 Health and safety risks are managed through implemented and enforced plans</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and farms included in the unit of certification. Occupational, environmental and medical risks identified during screening are managed in line with global best practice. For further information, see Guidance</p> <p>Guidance: Transportation safety control strategies (safe vehicles, worker seating, and safe storage of farm equipment) should be conducting in alignment with ILO Safety and Health in Agriculture publication Section 15.3 (<a href="https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/normative_instrument/wcms_161135.pdf">https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/normative_instrument/wcms_161135.pdf</a>) In evaluating heat stress risk, operators must either adhere to the rest schedule provided in guidance (validated specifically for the sugarcane production context), employ NOISH methodology for rest times associated with WGBT and/or heat index, or comply with sufficiently prescriptive national legislation. Fatigue risks should be managed in recognition of the multifaceted health risks incumbent with fatigue (see: <a href="https://www.cdc.gov/niosh/topics/workschedules/2019abstracts/AgForestryFish2.html">https://www.cdc.gov/niosh/topics/workschedules/2019abstracts/AgForestryFish2.html</a>). Basic screens for fatigue risk are available (see: <a href="https://nasdonline.org/872/d000705/sleep-deprivation-causes-and-consequences.html">https://nasdonline.org/872/d000705/sleep-deprivation-causes-and-consequences.html</a>) Medical and occupational risks should be managed in alignment with ILO 184 <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C184">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C184</a></p>
<p><b>Indicator 2.1.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests for a heat stress assessment and management OSHA or national legislation (if sufficient) to be used instead of ILO guidelines.</li> <li>➤ The distinction in occupational risks and environmental risks is incorrect. For example, in OSH guidelines, heat stress is a function of exposure to environmental heat and physical work demand though it is listed in the indicator as an environmental risk.</li> </ul>		<p><b>Indicator 2.1.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ For more details on methodology and types of hazards, refer to guidance (see Annex 2 of Standard).</li> <li>➤ See SRWG Guidance on timebound progressive implementation plan for more details on how operators are expected to progressively include the whole cane supplying area.</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Requests for a stepwise support in the implementation of risk assessment methodology. Bonsucro needs to otherwise provide clear prescriptive metrics as reference.</li> </ul>			
New indicator (post-public consultation with changes made by the SRWG)			
2.1.2 Health and safety risks are managed through implemented and enforced plans	Mill Agriculture  CORE INDICATOR	Yes	Applies to all workers on the premises of the mill and farms included in the unit of certification. Occupational, environmental and medical risks identified during screening are managed in line with global best practice.  <i>For further information, see Guidance</i>
Previous indicator (pre-public consultation)			
2.1.3 Right to water and sanitation safeguards are designed implemented and enforced	Mill Agriculture	100%	CORE INDICATOR Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator shall provide cool, safe drinking water to all workers, in close proximity to where they work. Recommended water consumption will depend on heat exposure and workloads. The operator shall provide access to water for sanitation hand washing, skin cooling as well as access to toilet facilities. Separate toilet facilities shall be provided to men and to female workers.  <i>For further information, see Guidance.</i>
<b>Indicator 2.1.3 – Comments from the public consultation</b>		<b>Indicator 2.1.3 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Some confusion around the recommendation for the provision of cool water. Suggestion to take out the term 'cool water' and instead put emphasis on safe drinking water.</li> <li>➤ Clarifications needed on what constitutes "proximity" to work.</li> </ul>		<ul style="list-style-type: none"> <li>➤ The term 'cool' has been removed to emphasise 'safe drinking water'</li> <li>➤ The SRWG has included additional wording around the types of uses of water for sanitation and toilet facilities.</li> <li>➤ The sentence "Separate toilet facilities shall be provided to men and to female workers" has been added as per suggestion made in the public consultation</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Questions around the rationale of having separate washrooms for men / women when in certain areas, unisex bathrooms are the norm.</li> <li>➤ Should consider COVID-19 precautionary measures in the provision of sanitation resources.</li> </ul>			
New indicator (post-public consultation with changes made by the SRWG)			
2.1.3 Right to water and sanitation safeguards are designed implemented and enforced	Mill Agriculture  CORE INDICATOR	100%	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator provides, safe drinking water to all workers, in close proximity to where they work. Recommended water consumption will depend on heat exposure and workloads.</p> <p>The operator provides access to water for sanitation, hand washing, skin cooling as well as access to toilet facilities. Separate toilet facilities are provided to men and to women workers, unless unisex facilities are the cultural norm in the country.</p> <p><i>For further information, see Guidance.</i></p>
Previous indicator (pre-public consultation)			
2.1.4. Appropriate personal protective equipment supplied to and used by all workers free of charge	Mill Agriculture	Yes	<p>CORE INDICATOR</p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Required, approved and adequate PPE shall be issued for free to the workers and be in good condition. The operator shall train workers in the use of PPE. The operator shall implement a system to monitor the effective use of PPE.</p> <p>For further information, see Guidance.</p> <p>GUIDANCE: PPE usage and training shall be identified In the risk assessment (Indicator 2.1.1)</p>
<b>Indicator 2.1.4 – Comments from the public consultation</b>		<b>Indicator 2.1.4 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Support from social NGOs and CBs for the provision of free PPEs to encourage adoption and usage. Industry respondents are of the view that the cost of damaged PPEs should be laid on the employee.</li> </ul>		<ul style="list-style-type: none"> <li>➤ See guidance in Annex 2 of the Standard for more details on uses of PPE and responsibilities for replacing PPEs</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Guidance should give examples of when PPE should be used to protect workers (e.g., chemical, sun, noise etc).</li> </ul>			
New indicator (post-public consultation with changes made by the SRWG)			
2.1.4. Appropriate personal protective equipment supplied to and used by all workers free of charge	Mill Agriculture  CORE INDICATOR	Yes	Applies to all workers on the premises of the mill and farms included in the unit of certification. Required, approved and adequate PPE shall be issued for free to the workers and be in good condition. The operator shall train workers in the use of PPE. The operator shall implement a system to monitor the effective use of PPE.  <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
2.1.5 Percentage of staff trained for health and safety at start and at least every year.	Mill Agriculture	90%	Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator shall ensure that all new employees receive basic instruction prior to formal training and update every year or as determined by the H&S management plan. For further information, see Guidance.
<b>Indicator 2.1.5 – Comments from the public consultation</b>			<b>Indicator 2.1.5 – Changes made by the SRWG</b>
<ul style="list-style-type: none"> <li>➤ Strong opposition to the review of this indicator from implementing a training plan over five years to a drastic requirement of requiring all staff to be trained each year. The capital investment to implement this according to industry actors makes this impractical.</li> <li>➤ A stepwise approach and detailed guidance for implementation is suggested.</li> </ul>			<ul style="list-style-type: none"> <li>➤ The SRWG has had discussion on the strengthening of this indicator and has elected to retain the yearly provision of training</li> <li>➤ The indicator covers ‘all workers’ and as such includes all workers working on the unit of certification. The guidance states that training is tailored to the level of the audience (including language), the tasks performed and the potential hazards of the workplace and activities performed.</li> </ul>

<p>➤ Questions around whether training should cover all workers in the plant – i.e. Administrative, Industrial and Agricultural as well as permanent/temporary?</p>		<p>➤ See SRWG Guidance on timebound progressive implementation plan for more details on how operators are expected to progressively include the whole cane supplying area.</p>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>2.1.5 Percentage of staff trained for health and safety at start and a refresher course at least every year.</p>	<p>Mill Agriculture</p>	<p>90%</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator ensures that all new workers receive and induction, which includes basic training on occupational health and safety instructions prior to beginning activities. The training includes the information about risks associated with activities performed by the workers.</p> <p>For workers starting a new job or taking on new activities, training associated to the specific health and safety risks associated to the new position or activity is provided.</p> <p>All workers receive an update with a refresher training at least every year or more frequently as determined by the H&amp;S management plan.</p> <p>Instructions on new issue-specific H&amp;S concerns are carried out as they emerge, e.g. on current issues like Covid.</p> <p>An OHS training plan is implemented progressively, including covering accident and work-related illness protocols <i>For further information, see Guidance.</i></p>
<p><b>Previous indicator (pre-public consultation)</b></p>			
<p>2.1.7 All workers have access to first aid and provision for emergency response</p>	<p>Mill Agriculture</p>	<p>100%</p>	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and farms included in the unit of certification. First aid supplies are available and checked, and dedicated personnel is trained to use them. Emergency response prevents the escalation of injury or illness and there shall be provision for injured or ill persons to receive professional medical treatment. <i>For further information, see Guidance.</i></p>
<p><b>Indicator 2.1.7 – Comments from the public consultation</b></p>		<p><b>Indicator 2.1.7 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.1.7 to 2.1.6</i></p>	

<ul style="list-style-type: none"> <li>➤ The guidance should clarify if healthcare provision covers emergencies of first aid for all workers.</li> <li>➤ Unions should be notified of accidents with workers in order to support and guide them in relation to labour rights and social security benefits.</li> <li>➤ Due medical referral should be made, ensuring the registration of occupational accidents in the respective cases with support and referral to the social security agency, when necessary.</li> </ul>		<ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard) <ul style="list-style-type: none"> <li>○ Guidance developed including emergencies and first aid.</li> </ul> </li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
2.1.6 All workers have access to first aid and provision for emergency response  (former 2.1.7)	Mill Agriculture  CORE INDICATOR	100%	Applies to all workers on the premises of the mill and farms included in the unit of certification. First aid supplies are available and checked, and dedicated personnel is trained to use them. Emergency response prevents the escalation of injury or illness and there shall be provision for injured or ill persons to receive professional medical treatment.  <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
2.1.6 Lost time accident frequency	Mill Agriculture	Mill <15; Agric <30 number per million hours worked	Applies to all workers on the premises of the mill and farms included in the unit of certification. A lost time accident is defined as an unexpected and unplanned event which results in a personal injury which causes the worker to be unable to carry on with his/her normal duties on the next day or next shift. Where a fatal injury occurs, this to be noted separately. For further information, see Guidance.  GUIDANCE: Incidents, non-fatal and fatal occupational injuries should be registered and analysed to identify their root cause and implementation of corrective actions, documented minimum annually. Incidents will be reported in rates that differentiate job types and employee/contractor relationships with the operator

### Indicator 2.1.6 – Comments from the public consultation

- Requests for the inclusion of a severity indicator/index in addition to frequency.
- Suggestion to instead refer to hours lost, as for minor injury the worker may be allowed to rest for 1 hour or 2 hours and later go back to work. In this case there is no loss for the next shift or next day, but 1 or 2 hours is lost for the factory which in turn needs to be calculated.
- Questions and comments around the setting of the accident thresholds.
  - For some, there is quite a big gap from the previous standard version and ask for consideration to reduce to 40 only instead of the suggested 30.
  - Requests for a 10% decrease for accidents in the field, with concerns that the current limits are still too high.
  - Recommendation that the values be based on specific studies and consultations with unions.
  - Does the accident count applies to company personnel only, or does it also include outsourced service providers/contractors?
- Some requests for this indicator to become core.
- Unions should be notified of accidents involving workers to support them and guide them in relation to labour rights and social security benefits.

### Indicator 2.1.6 – Changes made by the SRWG

***Please note that the indicator number has changed from 2.1.6 to 2.1.7***

- The SRWG has reviewed this indicator and elected to retain the original wording presented during the first public consultation
- The metric threshold has maintained as it was based on calculator data from certified entities
- The SRWG has decided to maintain the indicator as non-core
- The indicator applies to all workers present I the unit of certification regardless of contractual status
- Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard)

New indicator (post-public consultation with changes made by the SRWG)

<p>2.1.7 Lost time accident frequency  (former 2.1.6)</p>	<p>Mill Agriculture</p>	<p>Mill &lt;15; Agric &lt;30 number per million hours worked</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. A lost time accident is defined as an unexpected and unplanned event which results in a personal injury which causes the worker to be unable to carry on with his/her normal duties on the next day or next shift. Where a fatal injury occurs, this to be noted separately.  <i>For further information, see Guidance.</i></p>
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<p><b>Previous CRITERION name</b></p>	<p><b>2.2 To respect workers right to favourable working conditions</b></p>		
<p><b>General comments from the public consultation – Criteria 2.2</b></p> <ul style="list-style-type: none"> <li>➤ General agreement that the criterion protects workers against abuse and harassment but there are concerns about some ambiguity which needs to be properly clarified in the guidance in order to support implementation by the mills as well as objective auditing by the auditors.</li> <li>➤ Need for more clarity on gender issues such as: <ul style="list-style-type: none"> <li>➤ Equal wages for women - ensuring that their roles are not considered inferior and thus paid less.</li> <li>➤ The standard also needs to be locally adapted to cultural conditions to address discrimination and gender inequality.</li> <li>➤ Clarity on whether the Bonsucro requirements apply if national legislations are stronger/weaker.</li> <li>➤ Maternity / Paternity leave clearly indicated as a human right.</li> </ul> </li> </ul>		<p><b>Criteria 2.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out expectations around compliance with the indicators in this criterion (see annex 2 of the standard) <ul style="list-style-type: none"> <li>○ Guidance has been developed around equal wages for equal work</li> <li>○ Guidance has been developed around maternity leave</li> </ul> </li> </ul>	

<b>New CRITERION name</b>	<b>2.2 To provide employees (including migrant, seasonal and other contract labour) with benefits and salary sufficient to achieve an adequate standard of living (former 2.3)</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
2.2.7 Existence of a contract or equivalent document	Mill Agriculture	100 %	<p><b>CORE INDICATOR</b>          Applies to all workers on the premises of the mill and farms included in the unit of certification. All workers to be provided with a contract or equivalent document (e.g. national working card), to be explained their rights and obligations. If not specified by the law the contract shall include at least the following elements: hours of work, overtime payment, notice, rest periods, holidays, wages, mode of payment, and if legal, any deductions that will be made.          For further information, see Guidance.</p>
<p><b>Indicator 2.2.7 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Call for mechanisms to be in place to ensure that contracts are understood by all parties and that there is the possibility of contracts being in native languages.</li> <li>➤ Question on whether verbal contracts are valid and acceptable. The guidance should outline what the minimum contracts should contain / cover – the guidance that is being developed by the Sustainable Sugarcane Coalition in Mexico can be used as reference for members on types of contracts and templates.</li> </ul>		<p><b>Indicator 2.2.7 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.2.7 to 2.2.1</i></p> <ul style="list-style-type: none"> <li>➤ This indicator has been strengthened to include accessibility to all parties (including that a copy of the contract is provided to the worker and in their own language)</li> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator, including in cases where workers are illiterate (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			

<p>2.2.1 Existence of a contract or equivalent document  (former 2.2.7)</p>	<p>Mill Agriculture  CORE INDICATOR</p>	<p>100 %</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. All workers are provided with a contract or equivalent document (e.g. national working card), and are explained their rights and obligations. If not specified by the law the contract includes at least the following elements: hours of work, overtime hours and payment, notice, rest periods, holidays, parental/maternity/paternity leave, wages, mode of payment, and if legal, any deductions that will be made. A copy of the contract is provided to the worker and in their own language. The terms of these contracts are aligned with the parameters of this standard (e.g. maximum working hours and overtime).  <i>For further information, see Guidance.</i></p>
<p>Previous indicator (pre-public consultation)</p>			
<p>2.3.3 Maximum number of hours worked</p>	<p>Mill Agriculture</p>	<p>60 Hrs / week</p>	<p>CORE INDICATOR Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator shall ensure that workers do not work more than 60 hours a week. If local legislation allows for more hours worked, there is a 2- year phase in for this indicator from initial certification. Each worker must have at least 1 day off every 7 days. <i>For further information, see Guidance.</i></p>
<p><b>Indicator 2.3.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Emphasis on the need to align with national legislation: <ul style="list-style-type: none"> <li>○ Many of the respondents raising this concern are based in countries that have a legally allowable limit for working hours that is higher than what is stipulated in the standard.</li> <li>○ A few respondents also cited situations where labour agreements have included a higher allocation for working hours than Bonsucro.</li> <li>○ Respondents also raised concerns that the working hours limit does not provide a level playing field for them and they may also lose workers to other industries/companies who are not limited by the 60hrs/wk.</li> </ul> </li> </ul>		<p><b>Indicator 2.3.3 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 2.3.3 to 2.2.2</i></b></p> <ul style="list-style-type: none"> <li>➤ This indicator has been heavily reviewed and strengthened by the SRWG <ul style="list-style-type: none"> <li>○ Clarification that the working time does not exceed 60h (48h + 12h overtime) in line with ILO guidance.</li> <li>○ Inclusion of maximum working hours allowed per day</li> <li>○ Rest schedule now also includes 2 days off every 14 days worked</li> </ul> </li> <li>➤ In cases where local legislation allows for more hours worked, the operator demonstrates that circumstances are exceptional (c.f. guidance)</li> </ul>	

<p>In Australia, the work conditions (highly mechanized, minimal manual labour) combined with fatigue management procedures and implementation of Worksafe regulations, allow workers to work additional 'reasonable' hours.</p> <ul style="list-style-type: none"> <li>➤ Request for specific guidance on wages and maximum hours based on types of work instead of the general recommendations in the standard.</li> <li>➤ NGO respondents felt that a 60-hour limit is reasonable and must be maintained.</li> <li>➤ Need for a clarification in the implementation guidance that records of hours worked are essential as evidence (this is relevant for both 2.3.3 and 2.3.4). In countries where this is not required by law, many organizations used it as an excuse.</li> </ul>		<ul style="list-style-type: none"> <li>➤ The phase-in period has been extended to a 3-to-5-year phase in for this indicator from initial certification.</li> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
2.2.2 Maximum number of hours worked  (former 2.3.3)	Mill Agriculture  CORE INDICATOR	60 Hrs / week with one weekly free day or 2 free days in 14 working days	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification.</p> <p>The operator shall ensure that working time does not exceed 60 hours (48h + 12h overtime) or safe legal working conditions (whichever is lower), averaged monthly. The maximum number of hours worked during a day does not exceed 12h. If local legislation allows for more hours worked, the operator demonstrates that circumstances are exceptional (c.f. guidance). There is a 3-to-5-year phase in for this indicator from initial certification.</p> <p>Each worker must have at least 1 day off every 7 days or 2 days off every 14 days worked.</p> <p><i>For further information, see guidance.</i></p>
Previous indicator (pre-public consultation)			

<p>2.3.4 Overtime is paid at a premium rate or equally compensated</p>	<p>Mill Agriculture</p>	<p>&gt;50%</p>	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and the farms included in the unit of certification. Overtime work (either defined internally if in line with national law or by national legislation) shall be voluntary. The total overtime hours shall not exceed the level set by national legislation. <i>For further information, see Guidance.</i></p> <p><b>Guidance</b> Include Overtime equivalents and fair rates and references regarding ILO Convention 1, ILO Convention 110, ILO C131 - Minimum Wage Fixing Convention, and ILO, Minimum Wage Policy Guide</p>
<p><b>Indicator 2.3.4 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Majority felt that this indicator needs to be implemented in consideration of national legislation. <ul style="list-style-type: none"> <li>○ For instance, respondents from Costa Rica flagged this indicator as being impossible to implement due to contradictions with national law. One suggestion has been made for local legislation to be considered, and in the absence of it, a minimum of 50% applies.</li> </ul> </li> <li>➤ Voluntary overtime hours should be reflected in the employment/worker’s contract and payroll documents should be provided to present accurate information for all work performed, including overtime. <ul style="list-style-type: none"> <li>○ Allowing overtime hours greater than 50% of regular hours may be detrimental to workers; it was recommended that this be changed to less or equal to 50% of their regular hours.</li> </ul> </li> <li>➤ Some guidance needed on the application of the 50% around alignment with national law, such as: <ul style="list-style-type: none"> <li>○ Does the 50% strictly apply or does national legislation apply in overtime pay? If the law allows 25% (depending on the type of</li> </ul> </li> </ul>		<p><b>Indicator 2.3.4– Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 2.3.4 to 2.2.3</i></b></p> <ul style="list-style-type: none"> <li>➤ This indicator has been reviewed and strengthened by the SRWG <ul style="list-style-type: none"> <li>○ Clarification that overtime work shall be voluntary and <b>exceptional</b></li> <li>○ Voluntary overtime hours are reflected in the employment/worker’s contract and payroll documents are provided to present accurate information for all work performed, including overtime.</li> </ul> </li> <li>➤ The scope of this indicator has been reviewed and changed from &gt;50% to 25%</li> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<p>overtime, which is in the collective agreement), will the plant still have to pay 50% to comply with Bonsucro?</p> <ul style="list-style-type: none"> <li>Some sugar factories apply a tier system for overtime hours e.g. + 20% for the first 5 hours and then + 50% for the following ones. Can the Bonsucro standard allow for such graduation?</li> </ul>			
New indicator (post-public consultation with changes made by the SRWG)			
<p>2.2.3 Overtime is paid at a premium rate.</p> <p>(former 2.3.4)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	<p>&gt;25%</p>	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification. Overtime work shall be voluntary and exceptional. Voluntary overtime hours are reflected in the employment/worker's contract and payroll documents are provided to present accurate information for all work performed, including overtime.</p> <p><i>For further information, see guidance.</i></p>
Previous indicator (pre-public consultation)			
<p>2.3.1 Ratio of lowest entry level wage including benefits to minimum wage and benefits required by law</p>	<p>Mill Agriculture</p>	<p>≥1 \$/\$</p>	<p>CORE INDICATOR</p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Minimum wage as defined by legal requirement. In the absence of this, ILO C131 can serve as a basis for the definition.</p> <p>All benefits shall be paid and pay slips shall be provided. Payment of wage shall be in line with ILO 95 and 110 as detailed in the Guidance.</p> <p>If wages are negotiated voluntarily between employers and workers' organizations, those negotiated wage amount(s) apply to all workers covered under the negotiated agreement.</p> <p>For further information, see Guidance.</p> <p>Guidance: Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in a language they understand.</p> <p>Management-required training takes place during normal working hours and is fully compensated.</p>

<b>Indicator 2.3.1 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Indicator is silent on the payment of social security (is it covered under benefits?).</li> <li>➤ Clarifications needed on what the benefits cover (e.g. are they only those required by law?), or it would be better to consider only gross wages, since benefits are not wages.</li> <li>➤ Request for in-kind payments be prohibited.</li> </ul> <p>Comment that it is not always possible to provide pay slips to all workers especially temporary workers at farm level.</p>		<b>Indicator 2.3.1 – Changes made by the SRWG</b> <p><b><i>Please note that the indicator number has changed from 2.3.1 to 2.2.4</i></b></p> <ul style="list-style-type: none"> <li>➤ This indicator has been reviewed and strengthened by the SRWG <ul style="list-style-type: none"> <li>○ Clarification that Minimum wage is paid as defined by legal requirement.</li> <li>○ Inclusion of text on the negotiation of wages between employers and worker organisations</li> <li>○ Inclusion of a 30% limit on in-kind payments</li> </ul> </li> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
2.2.4 Ratio of lowest entry level wage including benefits to minimum wage and benefits required by law.  (former 2.3.1)	Mill Agriculture  CORE INDICATOR	≥1 \$/\$	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification.</p> <p>Minimum wage is paid as defined by legal requirement.</p> <p>If wages are negotiated voluntarily between employers and workers' organizations, those negotiated wage amount(s) apply to all workers covered under the negotiated agreement. In cases where the law permits in-kind forms of payments, these do not exceed 30% of the minimum wage.</p> <p><i>For further information, see guidance.</i></p>
<b>Previous indicator (pre-public consultation)</b>			
2.3.2 Minimum wage is guaranteed to piece rate paid workers	Mill Agriculture	≥1 \$/\$	<p>CORE INDICATOR</p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Minimum wage is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. If under these conditions, the piecework rate does not meet the minimum wage, then the wage level is upgraded to at least the minimum wage. No more than 30% of the</p>

			<p>required minimum wage is paid in-kind. Curtailed days (by management or due to workplace incidents/injuries) must be compensated as a full day. For further information, see Guidance.</p>
<p><b>Indicator 2.3.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests for Bonsucro to provide clear guidance for countries with no established minimum wage and to define “in-kind” benefits.</li> <li>➤ Piece rate quotas may be detrimental to the health and wellbeing of workers as they have to overwork to earn minimum wage if wages are not adjusted to make sure working reasonable hours will guarantee earning a living wage. <ul style="list-style-type: none"> <li>➤ Suggestions to delete piece rate payment or enforce minimum wage for piece rate workers.</li> <li>➤ Social NGOs were of the view that piece rate payments should not be encouraged as it has an adverse impact for workers.</li> </ul> </li> <li>➤ Confusion among respondents between living wage and minimum wage (potentially confusing 2.3.2 and 2.3.5) with some respondents using minimum wage and living wage interchangeably in their comments.</li> <li>➤ The clause “No more than 30% of the required minimum wage is paid in-kind.” Highlighted as potentially problematic as it creates a locked-in situation. <ul style="list-style-type: none"> <li>➤ Suggestion that the 30% level should be based on what is appropriate for the local/regional situation, rather than fixed.</li> </ul> </li> </ul>			<p><b>Indicator 2.3.2 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.3.2 to 2.2.5</i></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed the comments submitted in the first public consultation and has elected to retain this indicator as it was, minus some edits for clarity (e.g. links to indicators 2.2.4 and 2.2.2).</li> <li>➤ Guidance has been developed setting out expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>

➤ Suggested text edit for indicator 2.3.2 "...minimum wage is paid to all workers, including those on piece rate quotas..."			
New indicator (post-public consultation with changes made by the SRWG)			
2.2.5 Minimum wage is guaranteed to piece rate paid workers.  (former 2.3.2)	Mill Agriculture	≥1 \$/\$	<p><b>CORE INDICATOR</b></p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification. Minimum wage is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on the proportion of the daily rate for minimum wage according to the hours worked (as covered in 2.2.4 and 2.2.2). If under these conditions, the piecework rate does not meet the minimum wage, then the wage level is upgraded to at least the minimum wage. No more than 30% of the required minimum wage is paid in-kind. Curtailed days (by management or due to workplace incidents/injuries) are compensated as a full day.</p> <p><i>For further information, see guidance.</i></p>
Previous indicator (pre-public consultation)			
2.3.5 Movement to close living wage gap	Mill Ag	10%	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification. The company shall identify the gap between the Living Wage and the salary of its employees and has an action plan to close the gap by 10% by every Bonsucro re-certification audit. Bonsucro will provide the applicable living wage benchmark data that will be used to assess the living wage gap.</p> <p><i>For further information, see Guidance.</i></p> <p><b>Guidance</b></p> <p>Applies to all workers on the premises of the farms or mills included in the unit of certification. Decent/living wage as defined by the chosen benchmark methodology. Workers paid at piece-rate shall receive the required decent/living wage (according to standard output, a calculation for piece-rate workers based on achievable quotas during regular work hours). All benefits shall be paid. Pay slips and records shall be provided. Payment of wage shall be in line with ILO Convention No. 95 and 110. In absence of records, wages may be demonstrated through interview.</p>
Indicator 2.3.5 – Comments from the public consultation		Indicator 2.3.5 – Changes made by the SRWG	
		<p><b>Please note that the indicator number has changed from 2.3.5 to 2.2.6</b></p> <p>➤ This indicator has been reviewed and strengthened by the SRWG</p>	

- Majority of the respondents (mainly from industry) indicated that this indicator is very difficult/impossible to implement with many calling for its removal from the standard.
  - National circumstances should be considered as living wage is an issue that responds to national strategies and realities.
  - Living wage is not defined in Australia where minimum wage is mandatory and reviewed on an annual basis.
  - In Costa Rica, a minimum wage is defined by a tripartite body taking into account many important factors of its economic reality.
- Concerns around costs were raised especially since production costs are increasing, but not sugar prices (not even certified product prices, which do not have a price premium to cover this increase in wages).
  - Concern from operators in regions where the topography does not allow for mechanisation and thus have a high number of manual workforces.
- Need for clearer guidance on calculation of living wage to properly assess the feasibility of meeting the indicator.
- Some respondents also emphasised the importance of a phased approach towards implementation.
- Some questions were raised about the 10% gap closure
  - Requests for more clarity on how this will be calculated.
  - In the view of the industry respondents, it is unrealistic to require companies to close the gap between the living wage and salary of its workers by 10% at each Bonsucro recertification audit.

- Revision of the progressive implementation of this indicator (see 'scope' column)
- Applicable living wage reference values will be drawn from the Anker & Anker based living wage benchmark data that will be used to assess the living wage gap. In those regions where a benchmark is not yet available, the national minimum wage for the agricultural sector will be used as a reference as a first step towards a living wage.
- Guidance has been developed setting out the methodology for the calculation of living wage and expectations around compliance with this indicator (see annex 2 of the standard)
- This indicator remains non-core

➤ Suggestion to make this indicator a core indicator as it is a fundamental human right.			
New indicator (post-public consultation with changes made by the SRWG)			
2.2.6 Movement to close living wage gap  (former 2.3.5)	Mill Agriculture	<ul style="list-style-type: none"> <li>• 5% first certification period</li> <li>• 10% each successive certification period.</li> </ul>	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification.</p> <p>The operator shall benchmark the prevailing wages against the applicable living wage reference value. If there is a gap, the operator shall set an action plan towards progressively closing the gap by a minimum of 5% in the first certification period (year 1 – 3) and 10% in each successive certification periods (excluding yearly wage indexations on inflation).</p> <p>Applicable living wage reference values will be drawn from the Anker &amp; Anker based living wage benchmark data that will be used to assess the living wage gap. In those regions where a benchmark is not yet available, the national minimum wage for the agricultural sector will be used as a reference as a first step towards a living wage.</p> <p><i>For further information, see guidance.</i></p>
<b>CRITERION</b>	<b>2.3 To respect workers right to favourable working conditions (former 2.2)</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
2.2.3 Absence of discrimination	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b></p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification.</p> <p>The operator shall have a publicly available, implemented and communicated non-discrimination and equal opportunity policy.</p> <p>Discrimination includes any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment as defined by ILO C111 and C190, affecting equal pay, equal training opportunities, equal allocation of job opportunities, or equal adequacy of facilities for religious, recreation or functional purposes.</p>

			<p>Discrimination can be based on race, colour, gender, age, language, religion, property/wealth, nationality, ethnic/social origin, caste, disability, pregnancy, indigeneity, union affiliation, political affiliation, marital/family status, personal relationships, health status or other non-valid reasons. <i>For further information, see Guidance.</i></p> <p><b>GUIDANCE:</b> There is evidence of equal pay for the same work scope.</p>
<p><b>Indicator 2.2.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Concerns raised that the scope may be unrealistic for the operator to include contracted/ temporary workers on farms.</li> <li>➤ The provision of paternal leave (maternity/paternity leave) without discrimination should be included in the guidance.</li> <li>➤ The indicator mentions providing equal opportunities for workers but provides no guidance on how recruitment practices should be modified to accommodate this while addressing gender inequality / discrimination.</li> <li>➤ Indicator and guidance should also mention protection for the right of the LGBTQ community.</li> </ul>		<p><b>Indicator 2.2.3 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 2.2.3 to 2.3.1</i></b></p> <ul style="list-style-type: none"> <li>➤ Several additions have been made to the list of discriminations (including sexual orientation)</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>2.3.1 Absence of discrimination  (former 2.2.3)</p>	<p>Mill Agriculture  CORE INDICATOR</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator has a publicly available, implemented and communicated non-discrimination and equal opportunity policy applicable in recruitment, remuneration, access to training and promotion, and access to facilities. Discrimination includes any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment. Discrimination can be based on race, colour, gender identity, age, language, religion, property/wealth, nationality, ethnic/social origin, caste, disability, pregnancy, indigeneity, union affiliation, political affiliation,</p>

			<p>marital/family status, personal relationships, health status, sexual orientation or other non-valid reasons that are irrelevant to the skills, capabilities, qualities and medical fitness for the job.</p> <p><i>For further information, see guidance.</i></p>
Previous indicator (pre-public consultation)			
2.2.4 Absence of abuse/harassment	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b>  Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator shall have a publicly available, implemented and communicated policy to prevent sexual and all other forms of harassment and violence. The policy must ensure that no worker is subject to unacceptable behaviours and practices, or threats thereof, which results in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment as defined by ILO C190  <i>For further information, see Guidance.</i></p> <p><b>Guidance</b>  a. Workers and management are trained to recognize abuse, discrimination and harassment and to report cases without fear of reprisal  b. The following are prohibited:</p> <ul style="list-style-type: none"> <li>• Violence, threats and intimidation</li> <li>• Restrictions on toilet breaks</li> <li>• Unwanted physical contact</li> </ul>
<p><b>Indicator 2.2.4 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests to include: <ul style="list-style-type: none"> <li>➤ protection against psychological / mental abuse, verbal and non – verbal forms of sexual harassment.</li> <li>➤ whistle-blower channels, protection for whistle-blower (anonymity is required) and to ensure that issues are addressed in a timely manner.</li> <li>➤ considerations for specific safeguard policies for men and women.</li> </ul> </li> </ul>			<p><b>Indicator 2.2.4 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 2.2.4 to 2.3.2</i></b></p> <ul style="list-style-type: none"> <li>➤ The indicator now includes protection of whistle blowers</li> <li>➤ Extortion has been added to the list policy elements</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>

<ul style="list-style-type: none"> <li>➤ Reference to indicator 1.3.1 (or another that is more relevant), so that in addition to the employee understanding what is harassment, the company also has policies to prevent harassments from occurring, and in the event that it does happen, the employee needs to be informed of the means for reporting the harassment safely (without fear of retaliation).</li> <li>➤ Guidance should clarify the use of a designated channel for reporting harassments.</li> <li>➤ A question was raised on the difference between the policy required here and the one in indicator 1.1.1 (sustainability policy). Should there be two separate policies, or can there be one umbrella policy? Can the Code of Conduct also be considered as a policy?</li> </ul>			
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
2.3.2 Absence of abuse/harassment  (former 2.2.4)	Mill Agriculture  CORE INDICATOR	Yes	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator has a publicly available, implemented and communicated policy to prevent sexual and all other forms of harassment and violence. Whistle-blowers are protected and their anonymity guaranteed. The policy ensures that no worker is subject to unacceptable behaviours and practices, or threats thereof, which results in verbal and non-verbal forms of physical, psychological, sexual or economic harm, and includes gender-based violence, extortion and harassment.</p> <p><i>For further information, see guidance.</i></p>
<b>Previous indicator (pre-public consultation)</b>			

<p>2.2.2 Debt bondage, trafficking, and forced/compulsory labour are absent</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and farms included in the unit of certification. Forced or compulsory labour as defined per ILO Convention 29, ILO Convention 105 and updated ILO Protocol P029 (2014). Verification shall address all workers. <i>For further information, see Guidance.</i></p> <p><b>Guidance</b> The following are prohibited:</p> <ul style="list-style-type: none"> <li>• Recruitment fees paid by workers</li> <li>• Retention of workers' original identification papers</li> <li>• Wage deductions for protective gear, meals, beverages or other essential work-related items</li> <li>• Use of prison labour</li> <li>• Restrictions on workers leaving operation premises</li> <li>• Financial penalties or delayed wage payments to workers (including for non-completion of the season)</li> <li>• Contract substitution (changing/worsening of contract terms)</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Withholding of wages</li> </ul> <p>Debt bondage</p>
<p><b>Indicator 2.2.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ A respondent raised the point that advance payments in sugarcane supply chains are common, so it could be important to address how this might impact workers' freedom to resign within the first few weeks of employment.</li> <li>➤ Multiple forms of dependency are also a forced labour risk: internal migrant workers depend on crew leaders for transportation, housing, and health, as well as wages. It would be good to include criteria or guidance that addresses these specific vulnerabilities.</li> </ul>			<p><b>Indicator 2.2.2 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 2.2.2 to 2.3.3</i></b></p> <ul style="list-style-type: none"> <li>➤ References to ILO have been removed</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>

<p>➤ Several respondents also commented on the importance of allowing local unions to participate in the monitoring and inspection process for debt bondage, trafficking and forced labour.</p> <p>➤ Question raised on the prohibition of wage deductions pertaining to meals. The respondent wanted to clarify whether this applies to restaurants in the operating unit where the company pays one part and the employee another part of the total meal cost.</p>			
New indicator (post-public consultation with changes made by the SRWG)			
2.3.3 Debt bondage, trafficking, and forced / compulsory labour are absent.  (former 2.2.2)	Mill Agriculture  CORE INDICATOR	Yes	Applies to all workers on the premises of the mill and farms included in the unit of certification. Forced or compulsory labour Verification addresses all workers.  <i>For further information, see guidance.</i>
Previous indicator (pre-public consultation)			
2.2.1 Minimum age of workers	Mill Agriculture	18 Years	CORE INDICATOR Applies to all workers on the premises of the mill and farms included in the unit of certification. Definition of child labour based on ILO Convention 138 and 182. For young workers above the legal minimum working age but below 18, and for legal apprenticeships, there should be restrictions on hours of work and overtime; working at dangerous heights; with dangerous machinery, equipment and tools; Transport of heavy loads; exposure to hazardous substances or processes; and difficult conditions such as night work at night are prohibited. Note that special conditions set by ILO Convention C138 might apply. The operator shall implement a system to check worker's ages. <i>For further information, see Guidance.</i>  GUIDANCE:

			No children can be working in the field.
<p><b>Indicator 2.2.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Implications of employing only those who have attained the minimum age could lead to minors engaging in crimes for lack of other opportunities. <ul style="list-style-type: none"> <li>➤ Strict compliance with this indicator would mean leaving several young people with families to look for other workplaces and may lead them to organized crime etc.</li> </ul> </li> <li>➤ Guidance needed on guidelines for engaging people of an acceptable age in non-hazardous work.</li> <li>➤ Need for an independent study to establish working conditions mentioned in the requirement and also to include dialogue with the unions.</li> <li>➤ Requests for more guidance on verifying age especially in situations where birth certificates or any other relevant documents are not available.</li> <li>➤ Mills must they have identified the root causes of child labour in the region (of operation), and have established actions plans to address the cases of child labour and finding solutions for those critical cases.</li> <li>➤ Comment for Bonsucro to recognize familiar work (child assisting family).</li> </ul>		<p><b>Indicator 2.2.1 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.2.1 to 2.3.4</i></p> <ul style="list-style-type: none"> <li>➤ This indicator has been reviewed and strengthened by the SRWG <ul style="list-style-type: none"> <li>○ Clarification that this indicator applies to all underaged persons on the premises of the mill and farms included in the unit of certification, regardless of whether they are employed by the operator</li> <li>○ Underaged workers are not present in the fields or managing heavy equipment</li> <li>○ Special condition apply for underaged work (see guidance)</li> </ul> </li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ The SRWG would like to mention that familiar work is not covered in this Standard as it is expected to apply to those mills using the Bonsucro Production Standard for Smallholder farmers.</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			

<p>2.3.4 Absence of child labour  (former 2.2.1)</p>	<p>Mill Agriculture  CORE INDICATOR</p>	<p>18 Years</p>	<p>Applies to all underaged persons on the premises of the mill and farms included in the unit of certification, regardless of whether they are employed by the operator, and assures that no workers under 18 are present in fields or managing heavy equipment.</p> <p>For young workers above the legal minimum working age but below 18, and for legal apprenticeships, there are restrictions on hours of work and overtime; working at dangerous heights; with dangerous machinery, equipment and tools; Transport of heavy loads; exposure to hazardous substances or processes; and difficult conditions such as night work at night are prohibited. Note that special conditions might apply.</p> <p>The operator implements a system to check worker's ages.</p> <p><i>For further information, see guidance.</i></p>
<p>Previous indicator (pre-public consultation)</p>			
<p>2.1.8 Adequate accommodation is provided</p>	<p>Mill Agriculture</p>	<p>100%</p>	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and farmers included in the unit of certification for whom housing is provided. Housing provided must meet local regulatory standards, or the requirements stated in the guidance, whichever is more stringent as well as , ILO R115 Workers' Housing Recommendation Standards &amp; ILO on housing workers in isolation (far from towns with no access to telephones), restricting movement, etc. <i>For further information, see Guidance.</i></p> <p><b>GUIDANCE</b> The housing provided by the mill must meet local regulatory standards. If no regulatory standards exist, the following conditions must be met.</p> <ul style="list-style-type: none"> <li>a) Absence of rats, mice, insects and vermin, or conditions that favour their populations that could cause disease or carry parasites that function as vectors of diseases;</li> <li>b) Dry floors;</li> <li>c) Protection against rain, wind or cold weather conditions;</li> <li>d) No conditions posing imminent threats to the health or security of the occupants;</li> <li>e) A register of workers and family members that live in management provided housing;</li> <li>f) Separate beds;</li> <li>g) Doors with locking mechanism;</li> </ul>

			<p>h) Toilets at 1:15 people and wash facilities for 1:6 people (1 per family), with gender separated facilities.  i) Beds are not arranged in more than two levels;  j) Natural light during the daytime and artificial light for the night time;  k) Natural ventilation that ensures movement of air in all conditions of weather and climate;  l) Functional and effective fire wood smoke evacuation or ventilation mechanisms well maintained or repaired;  m) Non-leaking windows, doors and roofs;  n) At least one shower per 10 persons, separated by gender;  o) At least one large laundry sink for every 30 persons;  p) Installed and maintained fire extinguishing mechanisms;  q) Marked safety exits.</p>
<p><b>Indicator 2.1.8 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Confusion among some respondents on the applicability of this indicator with some interpreting it as employers needing to provide housing to all workers.</li> <li>➤ Some respondents felt that this should not be a core indicator as it is not applicable to all business units.</li> <li>➤ Need for clear guidance on different categories of workers and what is considered adequate housing – considering i) migrant workers with families, ii) permanent shelters, and iii) temporary shelters.</li> <li>➤ Clarification needed as to whether the provision of accommodation also cover contract workers, contractors, third parties?</li> <li>➤ Request for the requirements for family housing to be separated from worker camps.</li> <li>➤ Operators should be held responsible for the infrastructure conditions but not for the equipment (bed, furniture, kitchenware).</li> </ul>			<p><b>Indicator 2.1.8 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.1.8 to 2.3.5</i></p> <ul style="list-style-type: none"> <li>➤ Clarification that this indicator applies to all housing provided by the unit of certification directly or indirectly via subcontractors.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>

<ul style="list-style-type: none"> <li>➤ Request to include the participation of local unions in monitoring and inspecting the housing conditions.</li> <li>➤ Additional comments regarding the guidance provided with the standard draft: <ul style="list-style-type: none"> <li>➤ It says 1 toilet every 15 people and 1 wash facility every 6 people (1 per family) with separate facilities by sex. Does that mean there must be 2 toilets and wash facilities for men and women of the same family?</li> <li>➤ The requirement does not specify access to a kitchen with possibility to prepare and store food for own consumption.</li> <li>➤ No description of access to a locker or other safe storage for personal belongings.</li> <li>➤ There is no limit as to the minimum area per worker and is not clearly stated that a family unit should be given a separate room.</li> </ul> </li> </ul>			
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
2.3.5 Adequate accommodation is provided.  (former 2.1.8)	Mill Agriculture  CORE INDICATOR	100%	Applies to all housing provided by the unit of certification directly or indirectly via subcontractors. Housing provided must meet local sanitary regulatory standards, or the requirements stated in the guidance, whichever is more stringent.  <i>For further information, see guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
2.2.6 Working hours lost as percentage of total hours worked	Mill	< 5 %	This represents working hours lost through absence also referred to as “no-show” as well as strikes, non-justified sickness etc. It does not include holiday, legal time off such as maternity leave, or training. For further information, see Guidance.

<b>Indicator 2.2.6 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Need for clear guidance on how to treat justified absences -e.g. when a worker is absent with medical certificate, it is a justified absence and the worker is not penalized, but it is also an unscheduled absence.</li> <li>➤ Current worded is potentially confusing. Suggestion to use the term absenteeism rate instead.</li> </ul>		<b>Indicator 2.2.6 – Changes made by the SRWG</b> <p><i>Please note that the indicator number has changed from 2.2.6 to 2.2.7</i></p> <ul style="list-style-type: none"> <li>➤ Inclusion of term ‘absenteeism’</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
2.2.7 Working hours lost as percentage of total hours worked  (former 2.2.6)	Mill	< 5 %	This represents working hours lost due to absenteeism also referred to as “no-show” as well as strikes, non-justified sickness etc. It does not include holiday, legal time off such as maternity leave, or training.  <i>For further information, see Guidance.</i>
<b>CRITERION</b>			
<b>2.4 To safeguard labour rights via social dialogue, freedom of association and access to remedy</b>			
<b>General comments from the public consultation – Criteria 2.4</b> <ul style="list-style-type: none"> <li>➤ Generally, the purpose, scope and requirements for criterion 2.4 need to be more clearly described.</li> <li>➤ Need for more clarity on gender issues such as:             <ul style="list-style-type: none"> <li>➤ Equal wages for women - ensuring that their roles are not considered inferior and thus paid less.</li> <li>➤ Adaptability to cultural conditions to address discrimination and gender inequality.</li> </ul> </li> </ul>		<b>Criteria 2.4 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ Guidance has been developed and included as annex 2 of the standard.</li> <li>➤ The SRWG have reviewed the standard draft with a ‘gender lens’ to strengthen the requirements and make them more gender inclusive.</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Clarity on whether the Bonsucro requirements apply if national legislations are stronger/weaker.</li> <li>➤ Maternity / Paternity leave clearly indicated as a human right.</li> </ul>			
INDICATOR	Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)			
2.2.5 Respect the right of all workers to form and join trade unions and/or to bargain collectively free from interference from the operator	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b></p> <p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator shall respect such rights and shall not interfere with workers' own efforts to set up representational mechanisms in accordance with the law. The operator shall also promote other mechanisms of social dialogue (e.g. mix committees and worker consultation practices)</p> <p>The operator must apply guarantees to unionized workers throughout the workforce, extending to non-unionized workers.</p> <p>For further information, see Guidance.</p> <p>Guidance: The Unions and conveners of other forms of worker engagement must represent the expressed interest of workers, as validated through direct interviews with workers.</p>
<p><b>Indicator 2.2.5 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests for solidarity associations to be considered as an alternative to unions. In some contexts, solidarity associations also play an important role in engaging workers.</li> <li>➤ Some respondents (mostly industrial) felt that it is unrealistic to expect that all workers including temporary / occasional workers are unionized.</li> <li>➤ Industrial respondents were of the view that promoting social dialogue mechanisms is not within the mill's purview and asked that the text be reviewed.</li> </ul>		<p><b>Indicator 2.2.5 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.2.5 to 2.4.1</i></p> <ul style="list-style-type: none"> <li>➤ This indicator has been reviewed and strengthened by the SRWG <ul style="list-style-type: none"> <li>○ Reference to the Declaration on Human Rights and ILO Core Standard</li> <li>○ Addition of 'independent' in reference to representational mechanism</li> <li>○ Inclusion of Collective Bargaining Agreements (CBAs)</li> </ul> </li> <li>➤ The SRWG would like to mention that solidarity associations can be considered. It is up to the workers to choose their own method of</li> </ul>	

<ul style="list-style-type: none"> <li>➤ One question around whether operations in countries where unions are illegal can still get certified?</li> <li>➤ Request that workers who work on union activities should be considered as paid time and not considered lost time.</li> </ul>		<ul style="list-style-type: none"> <li>➤ organisation and representation without due interference from the operators.</li> <li>➤ The SRWG would</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
<p>2.4.1 Respect the right of all workers to form and join trade unions and to bargain collectively free from interference from the operator.</p> <p>(former 2.2.5)</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator respects such rights and does not interfere with workers' own efforts to set up independent representational mechanisms (unions or comparable organizing platforms) in accordance with the Universal Declaration of Human Rights and ILO core Standards.</p> <p>The operator applies guarantees to unionized workers throughout the workforce, extending to non-unionized workers.</p> <p>Collective Bargaining Agreements (CBAs) are regularly negotiated and renegotiated between employers' and workers' organizations and are duly respected to establish and the agreements made are transparent, documented and duly respected in their implementation.</p> <p><i>For further information, see guidance.</i></p>
Previous indicator (pre-public consultation)			
<p>2.4.2 - Social dialog demonstrates collaborative approach for engaging with workers / improving working conditions</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification. The operator shall conduct regular dialogues with direct and indirect workers to promote continuous improvement of working conditions and / or bargain collectively.</p> <p>For further information, see Guidance.</p> <p><b>GUIDANCE</b></p> <p>This shall be done by the creation, facilitation or improving formal and informal access to participation of workers and / or their representatives in H&amp;S committees, wages committees, grievance committees or other kinds of social dialogue spaces.</p>

<p><b>Indicator 2.4.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Strong feeling that 2.4.2 should be removed and that it contravenes ILO guidelines on the non-interference of the employer in workers' decisions. <ul style="list-style-type: none"> <li>➤ Several respondents commented that their national legislation already guarantees a space for social dialogue (which the companies have to comply with anyway), ek specially on health and safety issues.</li> </ul> </li> <li>➤ Concerns that it may be difficult to cover indirect workers as they may have a different contractual obligations and the mill pursuing a dialogue with them may result in friction between the mill and its service provider due to differences between policies and values.</li> <li>➤ Need for further guidance to help clarify the purpose of the indicator and what is required.</li> <li>➤ Definition for “indirect workers” is also needed.</li> <li>➤ Recommendation to make the following amendment "The operator shall conduct regular dialogues with direct and indirect workers to promote the continuous improvement of working conditions or, when applicable, carry out collective bargaining."</li> </ul>		<p><b>Indicator 2.4.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Addition of requirement for operators to promote other mechanisms of social dialogue (e.g. mix committees, gender committees, committees to address harassment, and worker consultation practices).</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ Definition for worker is developed.</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>2.4.2 Social Dialogue promotes consultation and information exchange</p>	<p>Mill Agriculture  CORE INDICATOR</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification. The operator engages in regular dialogues with direct and indirect workers to promote continuous improvement of working conditions and bargain collectively. The operator also promotes other mechanisms of social dialogue (e.g. mix committees, gender committees, committees to address harassment, and worker consultation practices).</p>

between and among employers' and workers' organizations.			<i>For further information, see guidance.</i>
Previous indicator (pre-public consultation)			
2.4.1 - Grievance mechanism for workers are in place	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b> Applies to all workers on the premises of the mill and the farms included in the unit of certification. To ensure that workers have access to processes that address their impacts, the operator must have in place a mutually agreed on and documented grievance mechanism that meets the expectations laid out in the UN Guiding Principles for Business and Human Rights: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement. In practice it meets the following:</p> <ul style="list-style-type: none"> <li>• It ensures anonymity of complainants where requested by complainants, protecting them from risk of reprisal or intimidation. It also safeguards against nondisclosure rules set by the company.</li> <li>• Procedures are in place to ensure that the system is effectively communicated to and understood by the affected parties, including by illiterate parties or workers whose native language is not the operation's language.</li> <li>• The operators keep parties to a grievance informed of its progress, timeframe and outcomes.</li> <li>• The system allows for complainants to choose individuals or groups to support them and/or act as observers.</li> </ul> <p>The indicator shall cover the whole supply area, centralized at the operation without requiring separate grievance processes for individual farms (grievances against farms can be brought to the operator). <i>For further information, see Guidance.</i></p> <p><b>Guidance</b> A grievance log is published annually, summarizing all complaints fielded by the operation (anonymizing complainants and defendants as appropriate), identifying strategies to expand access/buy-in to the complaint mechanism, and describing interventions planned to address potential root-causes of existing complaints in a systematic manner</p>

<p><b>Indicator 2.4.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests for Bonsucro to clarify the scope of application. It should also be noted that: <ul style="list-style-type: none"> <li>➤ many respondents were against extending the scope to include “whole supply area”.</li> <li>➤ It needs to be clear that the conflict resolution referred here is about workers and not to be confused with that between company and community (i.e. indicator 1.3.1).</li> </ul> </li> <li>➤ Guidance on publication of grievance log is unclear – i.e. where should it be published, accessible to whom, how to protect anonymity, what about unverified reports.</li> <li>➤ The requirement to publish were flagged as a concern by industry players as they are of the view that it may negatively affect their image.</li> <li>➤ Need to consider national context and legislation. An example was given of India where there is The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 which protects women from sexual harassment at their place of work. This law requires all units with more than 10 employees to have a Complaints Committee and a separate Redressal Mechanism for women facing harassment and sexual harassment at workplace.</li> </ul>		<p><b>Indicator 2.4.1 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 2.4.1 to 2.4.3</i></p> <ul style="list-style-type: none"> <li>➤ ‘In practice’ section has been moved to the guidance.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ References to publication of grievance log has been removed from the standard and included in the guidance with detail on expectation around compliance.</li> <li>➤ The SRWG considers important for this indicator to remain applicable to the whole supply area. Recognising and hearing the complexity of applying this indicator to beyond the unit of certification, the standard allows for operators to identify their own priorities and targets according to their own resources, and develop their own implementation plans to reach the level set in the indicator.</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>2.4.3 Grievance mechanism for workers are in place.</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p>Applies to all workers on the premises of the mill and the farms included in the unit of certification. To ensure that workers have access to processes that address their impacts, the operator has in place a mutually agreed on and documented grievance mechanism that meets the expectations laid out in the UN</p>

<p>(former 2.41)</p>	<p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>Guiding Principles for Business and Human Rights: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement.</p> <p>The indicator covers the whole cane supplying area, centralized at the operation without requiring separate grievance processes for individual farms (grievances against farms can be brought to the operator).</p> <p><i>For further information, see guidance.</i></p>
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**PRINCIPLE 3 - MANAGE INPUT, PRODUCTION AND PROCESSING EFFICIENCIES TO ENHANCE SUSTAINABILITY**

<b>CRITERION</b>		<b>3.1 To monitor production and process efficiency; to measure the impacts of production and processing so that improvements are made over time</b>	
<b>General comments from the public consultation – Criterion 3.1</b> <ul style="list-style-type: none"> <li>➤ General need for more guidance, especially on the proposed methodology for implementation. This was highlighted as being particularly important since the mills handle confidential information on agricultural and industrial efficiencies as part of their share and competitive advantage in the market.</li> <li>➤ Need to define parameters for units that are Bonsucro certified, but which are not sugar and ethanol Mills, such as cachaçarias. The parameters applicable to cachaçarias are different from those expected from a plant of sugar/ethanol.</li> </ul>		<b>Criterion 3.1 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the methodologies and expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ It is assumed that the technical indicators of the standard are relevant for all kinds of technological models to produce sugar and its derivatives, however, due to the lack of background studies on the applicability of the Standard to non-centrifugal sugar, efficiency metrics might be revised in future version of the Standard as more information becomes available.</li> </ul>	
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
3.1.1 Yield of production	Agriculture	Tc/ha Depending on climatic zone	To maximise yield taking into account the climatic conditions where cane is grown. Climatic zones are determined according to the GPS coordinates of the gathering mill. <i>For further information, see Guidance.</i>

<b>Indicator 3.1.1– Comments from the public consultation</b>		<b>Indicator 3.1.1 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Suggestions to rework this indicator to allow for parameters on geological and topography of the cultivation areas, instead of just climatic zone. As one respondent highlighted, 'the climate changes every year'.</li> <li>➤ In the case where the yield of production is defined by climatic zone, it is important that the climatic zones are defined by the GPS coordinate of the farm in question. In the current format, many farms are in transition areas and as the resolution of the Bonsucro climatic zones map is not very high, it is impossible to accurately determine where the farms are located and often end up with erroneous non-conformities or false conformities.</li> </ul>		<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
3.1.1 Yield of production	Agriculture	Tc/ha Depending on climatic zone	To maximise yield taking into account the climatic conditions where cane is grown. Climatic zones are determined according to the GPS coordinates of the gathering mill.  <i>For further information, see Guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
3.1.2 Theoretical recoverable sugar content of cane	Mill Agriculture	>10%	Based on the theoretical recovery normalised for juice purity and cane fibre content. <i>For further information, see Guidance.</i>
<b>Indicator 3.1.2 – Comments from the public consultation</b>		<b>Indicator 3.1.2 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Concern that sugarcane quality is also influenced by several environmental factors that are beyond the control of the mill, making an NC in indicators 3.1.1 and 3.1.2 difficult to correct.             <ul style="list-style-type: none"> <li>➤ For instance, the theoretical recovery of sugar (TRC) in some areas is less than 10%, because of the climatic and geographical conditions. How will this be addressed?</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<p>Getting higher sugar recovery would require long-term work. Every mill makes decisions on cane varieties based on their needs and soil conditions. TRS will vary year over year and season to season based on climate. TRS will also vary between agroclimatic zones. In India, the TRS is ranging from 8% hence this will be a continuous non-compliance for the mills in this geographical area. Hence, the standard of &gt;10% need to be re-considered.</p>			
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
3.1.2 Theoretical recoverable sugar content of cane	Mill Agriculture	>10%	Based on the theoretical recovery normalised for juice purity and cane fibre content. <i>For further information, see Guidance.</i>
<p><b>Previous indicator (pre-public consultation)</b></p>			
3.1.3 Fermentable total sugars content of cane, expressed as invert (TSAI)	Mill Agriculture	>120Kg/t cane	Used if ethanol is produced, on its own or in conjunction with sugar production. Based on a 90.5 % utilisation of Total Sugars As Invert (TSAI). <i>For further information, see Guidance.</i>
<p><b>Indicator 3.1.3 – Comments from the public consultation</b></p> <p>No comments</p>		<p><b>Indicator 3.1.3 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			

3.1.3 Fermentable total sugars content of cane, expressed as invert (TSAI)	Mill Agriculture	>120Kg/t cane	Used if ethanol is produced, on its own or in conjunction with sugar production. Based on a 90.5 % utilisation of Total Sugars As Invert (TSAI). <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
3.1.4 Efficiency of harvesting operations	Mill Agriculture	<16 for machine harvesting <24 manual green harvesting <48 burnt cane harvesting	This measures the average time from harvesting (or burning) the cane until it is crushed by the mill (also known as the kill to mill time). For burnt cane it is the time from when the field is burnt prior to harvest until the cane is crushed. <i>For further information, see Guidance.</i>  Guidance: The harvesting is calculated for all harvesting organised by the mill plus in the unit of certification.
<b>Indicator 3.1.4 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Requests that areas of arson be excluded from the calculation in criterion.</li> <li>➤ In the event of accidental/criminal burning, the cane cannot be harvested until investigations are conducted which can take hours or days.</li> <li>➤ Need to clarify that the unit of measure is in hours, as this was unclear.</li> <li>➤ The manual harvesting and mechanical harvesting should both be considered when calculating the efficiency of harvesting operations.</li> <li>➤ Concern that the &lt;16 hours burn to crush requirement is impossible to achieve in their situation.</li> </ul>		<b>Indicator 3.1.4 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ Indicator clarifies that the unit of measurement is in hours.</li> </ul>	

<p>➤ Concern that the transport of sugarcane to the mill within 24 hours by manual harvesting cannot be achieved in practice. The average time is 48 hours to get to the mill after manual harvesting.</p> <p>➤ It was therefore suggested to change the limit to “≤48 manual green harvesting”.</p>			
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
3.1.4 Efficiency of harvesting operations	Mill Agriculture	<p>&lt;16 for machine harvesting &lt;24 manual green harvesting &lt;48 burnt cane harvesting</p>	<p>This measures the average time from harvesting (or burning) the cane until it is crushed by the mill (also known as the kill to mill time). For burnt cane it is the time from when the field is burnt prior to harvest until the cane is crushed.</p> <p><i>For further information, see Guidance.</i></p>
<p><b>Previous indicator (pre-public consultation)</b></p>			
3.1.5 Mill overall time efficiency	Mill	<p>&gt;75 % Processing time as a percentage of total crushing time</p>	<p>Processing time as a percentage of total crushing time. Any stoppage, including maintenance activities or power supply failure must be counted with the exception of stops due to rainfall exclusively.</p> <p><i>For further information, see Guidance.</i></p>
<p><b>Indicator 3.1.5 – Comments from the public consultation</b></p> <p>No comments</p>		<p><b>Indicator 3.1.5 – Changes made by the SRWG</b></p> <p>➤ The SRWG has elected to maintain this indicator as it is</p> <p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>	

New indicator (post-public consultation with changes made by the SRWG)			
3.1.5 Mill overall time efficiency	Mill	>75 % Processing time as a percentage of total crushing time	Processing time as a percentage of total crushing time. Any stoppage, including maintenance activities or power supply failure must be counted with the exception of stops due to rainfall exclusively.  <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
3.1.6 Factory Performance Index	Mill	>90%	Used if sugar and ethanol, only if produced from final molasses only and in the same mill. % of actual sugar recovery % theoretical recovery of sugar from cane. <i>For further information, see Guidance.</i>
<b>Indicator 3.1.6 – Comments from the public consultation</b>		<b>Indicator 3.1.6 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Only one main comment indicating that depending on the auditor's expertise and knowledge, the operator can be penalized for non-compliance even without carrying out production of ethanol from molasses.</li> </ul>		<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
3.1.6 Factory Performance Index	Mill	>90%	Used if sugar and ethanol, only if produced from final molasses only and in the same mill. % of actual sugar recovery % theoretical recovery of sugar from cane.  <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
3.1.7 Industrial Efficiency	Mill	>75%	Used if ethanol only or sugar and ethanol is produced from anything other than final molasses are produced in the same mill. It is the ratio expressed as a % of the sum of TSAI equivalent products (sugar, ethanol, yeast, and molasses) to the TSAI of the cane. <i>For further information, see Guidance.</i>

<b>Indicator 3.1.7 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Only one comment which noted that it is important to understand the metrics and parameters that must be achieved in order to comply with the established indicators.</li> <li>➤ It is also important to evaluate the information in the new guidance for the fulfilment of indicators 3.1.1, 3.1.6 and 3.1.7.</li> </ul>		<b>Indicator 3.1.7 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
3.1.7 Industrial Efficiency	Mill	>75%	Used if ethanol only or sugar and ethanol is produced from anything other than final molasses are produced in the same mill. It is the ratio expressed as a % of the sum of TSAI equivalent products (sugar, ethanol, yeast, and molasses) to the TSAI of the cane.  <i>For further information, see Guidance.</i>
<b>CRITERION</b>		<b>3.2 To monitor global warming emissions with a view to minimising climate change impacts</b>	
<b>General comments from the public consultation – Criterion 3.2</b> <ul style="list-style-type: none"> <li>➤ Requests for more details and guidance to be provided especially in the following areas:               <ul style="list-style-type: none"> <li>○ Methodology used</li> <li>○ National legislation that are taken into consideration</li> <li>○ Units used</li> </ul> </li> <li>➤ Request for the requirements to be more flexible based on different national and user contexts</li> </ul>		<b>Criterion 3.2 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the methodologies and expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Request that the coal and fuel consumed for the sale of condensing energy should not be taken into account for the Bonsucro standard. Same for the coal consumed by the bagasse exchange of the business with paper mills. <ul style="list-style-type: none"> <li>➤ Many sugar mills in the world do not have these two modes. This amount should not be counted in the calculation.</li> </ul> </li> <li>➤ Suggestion for the standard to not only sets a limit but to deliver continuous reduction through intentional, standard driven reductions in GHG emission in the cane sector.</li> </ul>							
INDICATOR	Scope	Standard	Full indicator wording				
Previous indicator (pre-public consultation)							
3.2.1 Climate change adaptation and resilience plan	Mill Agriculture	Yes	The operator shall identify climate change impacts and evaluate where these will negatively affect operations, setting up actions to mitigate the effect of climate change and reduce GHG emissions over time. <i>For further information, see Guidance.</i>				
<b>Indicator 3.2.1 – Comments from the public consultation</b>			<b>Indicator 3.2.1 – Changes made by the SRWG</b>				
<ul style="list-style-type: none"> <li>➤ Need for a clear definition of 'climate change' as this may differ depending on the geographical context.</li> <li>➤ Bonsucro should also specify how often the plan will be updated, as events vary from year to year.</li> <li>➤ Questions were raised on the real focus of indicator 3.2.1. Is the focus on GHG reduction?</li> <li>➤ Request for the inclusion of a mitigation plan for adaptation / mitigation to climate change and resilience to the requirement.</li> </ul>			<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator, including impacts relating to climate change (see annex 2 of the standard)</li> <li>➤ Adaptation and resilience plan are the title of this indicator.</li> </ul>				

<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
3.2.1 Climate change adaptation and resilience plan	Mill Agriculture	Yes	The operator shall identify climate change impacts and evaluate where these will negatively affect operations, setting up actions to mitigate the effect of climate change and reduce GHG emissions over time.  <i>For further information, see Guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
3.2.2 Net GHG emissions per tonne of cane	Agriculture	<40 Kg CO <sub>2</sub> eq/t cane	Estimates the emissions from agriculture activities. The result is also used in the calculation of the total emissions field-to-gate. <i>For further information, see Guidance.</i>
<b>Indicator 3.2.2 – Comments from the public consultation</b>		<b>Indicator 3.2.2 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Concern that the Bonsucro standard currently allows for the burning of cane (3.1), which may impact GHG emissions and thus have an impact on 3.2.2 and 3.2.3.</li> <li>➤ Concerns that the inclusion of direct land use change emissions are considered in the calculation (3.2.2) (for sugarcane plantation after January 1, 2008) greatly penalizes the mills. <ul style="list-style-type: none"> <li>➤ Taking into account the change in land use from pasture to sugarcane, the carbon sequestration of the sugarcane crop is much greater.</li> </ul> </li> <li>➤ Concern that this indicator is never diminished by time, even though there is already an established and stabilized culture, which makes industries and farms non-compliant.</li> </ul>		<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ While the Standard does not prevent cane burning, recognising the difficulties this would bring to communities of producers, the standard ask that the operators measure the GHG emissions resulting from the cane burning. By measuring impacts, producers are encouraged to reduce their footprint.</li> <li>➤ GHG methodology has been updated with the latest conversion values and approaches. <ul style="list-style-type: none"> <li>○ Including adopting the EU RED land use change methodology, which provides a more granular evaluation of the carbon emissions that result from land conversion. According to the situation, this might reflect positively on land use change emissions from degraded or pasture land.</li> </ul> </li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<p>➤ Suggestion to consider Renovabio's GHG calculation methodology as it depicts Brazilian industries in a more realistic way in terms of land use and change and, consequently, their emissions.</p>		<p>➤ Bonsucro is working on renovabio to align the methodology, however renovabio applies only to ethanol production while the Bonsucro methodology applies to all sugarcane derivatives.</p>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
3.2.2 Net GHG emissions per tonne of cane	Agriculture	<40 Kg CO <sub>2</sub> eq/t cane	Estimates the emissions from agriculture activities. The result is also used in the calculation of the total emissions field-to-gate.  <i>For further information, see Guidance.</i>
<p><b>Previous indicator (pre-public consultation)</b></p>			
3.2.3 Net GHG emissions per tonne of sugar	Mill Agriculture	Total <0.4 t CO <sub>2</sub> eq/t sugar	Only used if sugar is being produced. Field-to-gate emissions. Environmental Burden is t carbon dioxide equivalent.  <i>For further information, see Guidance.</i>
<p><b>Indicator 3.2.3 – Comments from the public consultation</b></p> <p>➤ Only one comment which requested to remove agriculture from the scope, in the case of individual producers (leaving only the mill)</p>		<p><b>Indicator 3.2.3 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>• In the case of producers certifying independently of the mill installations, producers need to provide only the farm relevant data. Compliance level will be verified at the mill level.</li> <li>• GHG methodology has been updated with the latest conversion values and approaches.</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
3.2.3 Net GHG emissions per tonne of sugar	Mill Agriculture	Total <0.4 t CO <sub>2</sub> eq/t sugar	Only used if sugar is being produced. Field-to-gate emissions. Environmental Burden is t carbon dioxide equivalent.  <i>For further information, see Guidance.</i>
<p><b>Previous indicator (pre-public consultation)</b></p>			

3.2.4 Net GHG emissions per MJ of ethanol	Mill Agriculture	Total <24 g CO <sub>2</sub> eq/MJ fuel	Used if ethanol is produced. Environmental Burden is g carbon dioxide equivalent. <i>For further information, see Guidance.</i>
<b>Indicator 3.2.4 – Comments from the public consultation</b>  ➤ Only one comment which suggested that the value of the calculator should not be used to declare the GHG in the Bonsucro EU ethanol sales notes.		<b>Indicator 3.2.4 – Changes made by the SRWG</b>  ➤ The SRWG has elected to maintain this indicator as it is ➤ GHG methodology has been updated with the latest conversion values and approaches. ➤ This indicator applies to Bonsucro Ethanol, not to Bonsucro EU ethanol. ➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)	
New indicator (post-public consultation with changes made by the SRWG)			
3.2.4 Net GHG emissions per MJ of ethanol	Mill Agriculture	Total <24 g CO <sub>2</sub> eq/MJ fuel	Used if ethanol is produced. Environmental Burden is g carbon dioxide equivalent. <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
3.2.5 Total Net Primary Energy Usage per kg product	Mill	Total <3000 KJ/kg	Direct and indirect energy inputs. <i>For further information, see Guidance.</i>
<b>Indicator 3.2.5 – Comments from the public consultation</b>  Further guidance required		<b>Indicator 3.2.5 – Changes made by the SRWG</b>  ➤ The SRWG has elected to maintain this indicator as it is ➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)	

New indicator (post-public consultation with changes made by the SRWG)			
3.2.5 Total Net Primary Energy Usage per kg product	Mill	Total <3000 KJ/kg	Direct and indirect energy inputs. <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
3.2.6 Energy used in cane transport per tonne cane transported	Mill	<50 MJ/t cane	Direct and indirect energy inputs. <i>For further information, see Guidance.</i>
<b>Indicator 3.2.6 – Comments from the public consultation</b>		<b>Indicator 3.2.6 – Changes made by the SRWG</b>	
Only one comment asking to review the status of this indicator to non-core		<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Indicator remains non-core</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
3.2.6 Energy used in cane transport per tonne cane transported	Mill	<50 MJ/t cane	Direct and indirect energy inputs. <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
3.2.7 Primary energy use per tonne of sugarcane	Agriculture	<300 MJ/t cane	Direct and indirect energy inputs. <i>For further information, see Guidance.</i>
<b>Indicator 3.2.7 – Comments from the public consultation</b>		<b>Indicator 3.2.7 – Changes made by the SRWG</b>	
➤ Further guidance required		➤ The SRWG has elected to maintain this indicator as it is	

			<ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
3.2.7 Primary energy use per tonne of sugarcane	Agriculture	<300 MJ/t cane	Direct and indirect energy inputs. <i>For further information, see Guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
3.2.8 Energy Return on Investment	Mill	<9 Energy Output / Energy input	Calculates the total energy needed to promote one MJ of energy, Applies only to ethanol production. <i>For further information, see Guidance.</i>
<b>Indicator 3.2.8 – Comments from the public consultation</b>		<b>Indicator 3.2.8 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Only one comment to review the status of this indicators to non-core</li> </ul>		<ul style="list-style-type: none"> <li>➤ The SRWG has elected to maintain this indicator as it is</li> <li>➤ Indicator remains non-core</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
3.2.8 Energy Return on Investment	Mill	<9 Energy Output / Energy input	Calculates the total energy needed to promote one MJ of energy, Applies only to ethanol production. <i>For further information, see Guidance.</i>

## PRINCIPLE 4 - ACTIVELY MANAGE BIODIVERSITY AND ECOSYSTEM SERVICES

CRITERION	4.1 To protect and rehabilitate biodiversity and ecosystem services, and HCVs are being maintained and enhanced on and around farms	
	<p><b>General comments from the public consultation – Criterion 4.1</b></p> <ul style="list-style-type: none"> <li>➤ General issues raised by respondents were based on the following:               <ul style="list-style-type: none"> <li>○ Ecosystem “services” should be replaced with “processes”.</li> <li>○ Need for more clarity on how this criterion will be audited. An EMP is managed according to the prioritization made by the company but with this change it is forced to manage all the indicators with equal priority</li> <li>○ The changes from EMP to this version are unclear. Adding more detail to the change log from the previous version would be helpful.</li> <li>○ It is necessary to know in greater detail what the specific requirements of this criterion are to prepare the biodiversity management plan; and these requirements must be adapted to the reality of each country.</li> <li>○ Need to define the macro content that the BMP should contemplate and its scope.</li> <li>○ A standardized criterion could be established on how to audit the EMP design</li> <li>○ Biodiversity and ecosystem management plans should be supported by experts in those fields from universities, NGO, private consultancies, and government agency.</li> <li>○ A prioritisation approach should be adopted - focus on the feasibility of implementing the actions identified with the greatest impact in the plan for own farms.</li> <li>○ Need to specify a frequency of revision of the Biodiversity Management Plan (BMP).</li> <li>○ “zero deforestation” should be used either in place of OR in addition to the protection of HCV, biodiversity and ecosystem services.</li> </ul> </li> </ul>	<p><b>Criterion 4.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ In collaboration with the HCV Resource Network, the SRWG has elected to revise the HCV indicators as follows:               <ul style="list-style-type: none"> <li>○ Focus of 4.1.1 is the mill operator, with the verifier being the maps, whereby the maps provide the framework for identifying biodiversity/HCV priorities and the specific attributes (habitats and species), and therefore is an important resource for the grower to develop/implement their BESMP.</li> <li>○ The development of BESMP now falls into 4.1.2 with growers developing and implementing BESMP, that account for risks to HCVs</li> <li>○ Previous 4.1.4 on maintaining/enhancing HCVs in ongoing cultivation is removed and now integrated into 4.1.1 (supply base mapping) and 4.1.2 leading to implementation of grower BESM</li> </ul> </li> </ul>

<ul style="list-style-type: none"> <li>○ Rehabilitation would take a series of actions that would need to be clearly defined based on the geographic scope and area of influence of the sugarcane project.</li> </ul>			
INDICATOR	Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)			
4.1.1 – Map biodiversity and ecosystem services on and around farm areas, and develop a Biodiversity Management Plan (BMP)	Agriculture	yes	<p><b>CORE INDICATOR</b></p> <p>The operator shall map the biodiversity resources and ecosystem services on and around planted areas which cane production rests upon and which it impacts. The mapping must cover the whole supply area, centralized at the operation under certification, without requiring separate mapping processes for individual farms. The BMP shall consider threats and impacts the cane production and the mill have on biodiversity and ecosystem services, identifying mitigation and restoration measures that must be taken. <i>For further information, see Guidance.</i></p> <p>Guidance: Biodiversity: rare, threatened or endangered species, and habitats and habitat corridors; areas protected by legislation, patches of natural vegetation and natural ecosystems including woodlands, forests, wetlands and grasslands/rangelands. Ecosystem services: riparian areas, natural wind screens, vegetative buffer zones, flood control, filtration areas.</p>
<p><b>Indicator 4.1.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests for more guidance such as what is required in the documentation for the BMP, contents of the BMP, consideration for local circumstances as well as the definition of terms and acronyms.</li> <li>➤ There was also confusion around the scope of application.</li> <li>➤ Suggestion to combine indicator 4.1.1 and 4.1.2 (i.e. map, maintain, and improve) and to include the following wording: "Identification may be carried out by competent personnel from the certification units."</li> </ul>		<p><b>Indicator 4.1.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ In collaboration with the HCV Resource Network, the SRWG has elected to revise the HCV indicators as follows: <ul style="list-style-type: none"> <li>○ Focus of 4.1.1 is the mill operator, with the verifier being the maps, whereby the maps provide the framework for identifying biodiversity/HCV priorities and the specific attributes (habitats and species), and therefore is an important resource for the grower to develop/implement their BESMP.</li> <li>○ The development of BESMP now falls into 4.1.2 with growers developing and implementing BESMP, that account for risks to HCVs</li> </ul> </li> </ul>	

<ul style="list-style-type: none"> <li>➤ Some questions were also raised, such as:             <ul style="list-style-type: none"> <li>➤ When referring to adjacent areas, over what distance would that cover?</li> <li>➤ What inclusion mechanisms can be used for communities to take care of Biodiversity in the areas of influence?</li> <li>➤ Is the Biodiversity Management Plan about local farm biodiversity or is it about management of deforestation free commodities?</li> <li>➤ Is the BMP is considered the same as the old Environmental Impact and Management Plan (EIMP)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>○ Previous 4.1.4 on maintaining/enhancing HCVs in ongoing cultivation is removed and now integrated into 4.1.1 (supply base mapping) and 4.1.2 leading to implementation of grower BESM</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>
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New indicator (post-public consultation with changes made by the SRWG)

<p>4.1.1 – Map biodiversity, ecosystem services and risks across the mill’s supply base.</p>	<p>Agriculture</p> <p>CORE INDICATOR</p>	<p>yes</p>	<p>The mill operator maps the biodiversity resources and ecosystem services on and around planted areas which cane production rests upon and which it impacts, integrated with the risk and impacts assessment detailed in indicator 1.1.4 and, and the HCV risk assessment in consultation with affected stakeholders as identified under indicator 1.1.2.</p> <p>The mapping covers the whole supply base co-ordinated and centralized at the operation under certification. The Biodiversity and Ecosystem Services Management Plan (BESMP) considers threats and impacts the cane production and the mill have on biodiversity and ecosystem services, identifying mitigation and restoration measures that must be taken.</p> <p>The BESMP furthermore incorporates any biodiversity and ecosystem service High Conservation Values (HCVs) as identified by the HCV risk assessment (see 4.1.4 below) to guarantee a wholistic approach to conservation.</p> <p><i>For further information, see guidance.</i></p>
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Previous indicator (pre-public consultation)

4.1.2 Maintain and enhance biodiversity and ecosystem services and services on and around farm areas	Agriculture	yes	<p>The operator shall implement and maintain the Biodiversity Management Plan, to maintain and progressively enhance or restore biodiversity / ecosystem services <i>For further information, see Guidance.</i></p> <p>Guidance: Including but not limited to: limiting the use of agrochemicals, protecting critical ecosystems, ensuring habitat connectivity, restoration of aquatic ecosystems and riparian buffer zones, restoration of farmed areas of marginal productivity to natural ecosystems, incorporation of native trees as border plantings and barriers around housing and infrastructure, live fences, shade trees, and permanent agroforestry systems.</p>
<p><b>Indicator 4.1.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Many respondents found the requirements to be unclear.</li> <li>➤ Similar comments to those raised in 4.1.1 such as clarity of scope (certified vs supply area), clarification of acronyms and terms. <ul style="list-style-type: none"> <li>➤ Suggestion to combine with 4.1.1.</li> </ul> </li> </ul>		<p><b>Indicator 4.1.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ In collaboration with the HCV Resource Network, the SRWG has elected to revise the HCV indicators as follows: <ul style="list-style-type: none"> <li>○ Focus of 4.1.1 is the mill operator, with the verifier being the maps, whereby the maps provide the framework for identifying biodiversity/HCV priorities and the specific attributes (habitats and species), and therefore is an important resource for the grower to develop/implement their BESMP.</li> <li>○ The development of BESMP now falls into 4.1.2 with growers developing and implementing BESMP, that account for risks to HCVs</li> <li>○ Previous 4.1.4 on maintaining/enhancing HCVs in ongoing cultivation is removed and now integrated into 4.1.1 (supply base mapping) and 4.1.2 leading to implementation of grower BESM</li> </ul> </li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
4.1.2 Maintain and enhance biodiversity, ecosystem services and HCVs on and around farm areas	Agriculture	yes	<p>The grower operator develops and implements a Biodiversity and Ecosystem Services Management Plan (BESMP). The BESMP considers threats and impacts the cane production have on biodiversity, ecosystem services and HCVs, identifying mitigation and restoration measures that must be taken.</p> <p><i>For further information, see guidance.</i></p>

Previous indicator (pre-public consultation)			
4.1.3 Percentage of areas of natural ecosystems defined internationally or nationally as legally protected converted to sugarcane on or after 1 January 2008	Agriculture	0%	<p><b>CORE INDICATOR</b> The operator shall conduct a historic land use change analysis of the unit of certification in order to determine if land converted to sugarcane on or after 1<sup>st</sup> January 2008 has damaged natural ecosystems defined internationally or nationally as legally protected.</p> <p>For further information, see Guidance.</p>
<p><b>Indicator 4.1.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ General requests for further guidance.</li> <li>➤ The standard does not indicate what happens if there was conversion of legally protected areas to sugarcane after 2008.</li> <li>➤ This indicator does not clearly state the impact of sugarcane cultivation in primary and secondary forests. Bonsucro should be clear about deforestation.</li> <li>➤ Regarding the environmental impact study in areas of field expansion, suggestion that the expansion areas comply with the local agro-environmental zoning, without the need to carry out an environmental impact study, not least because if it does not meet the zoning, it cannot be implemented.</li> <li>➤ For areas from the year 2008, requests to include in the Biodiversity Management Plan the efficient use and saving of water, reforestation programs, demarcation and monitoring for the management of biodiversity, plant buffer zones, conservation of natural ecosystems, care of wetlands and grasslands.</li> </ul>		<p><b>Indicator 4.1.3 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ No changes have been made to this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Suggestion to change the timeline to 5 years as natural ecosystem sites have been updated over the last 12 years.</li> <li>➤ Some questions were also raised such as:             <ul style="list-style-type: none"> <li>○ Should it be proven through satellite images? Will Bonsucro define what images these will be?</li> <li>○ Is an evaluation of the HCV values necessary on the land already developed?</li> <li>○ Does that mean the unit need to have prior HCV assessment carried out?</li> <li>○ How about if threatened ecosystems were present but was not formally protected until after 1 Jan 2008?</li> </ul> </li> </ul>	
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New indicator (post-public consultation with changes made by the SRWG)

4.1.3 Percentage of areas of natural ecosystems defined internationally or nationally as legally protected converted to sugarcane on or after 1 January 2008	Agriculture  CORE INDICATOR	0%	<p>The operator conducts a historic land use change analysis of the unit of certification in order to determine if land converted to sugarcane on or after 1<sup>st</sup> January 2008 has damaged natural ecosystems defined internationally or nationally as legally protected.</p> <p>For further information, see Guidance.</p>
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Previous indicator (pre-public consultation)

4.1.4 – High Conservation Value areas are maintained and enhanced	Agriculture	100%	<p>CORE INDICATOR</p> <p>For areas currently cultivated, the operator must conduct the “Bonsucro HCV risk assessment” and develop and implement the relevant resulting HCV mitigation measures and management plans. This shall cover the whole supply area, centralized at the operation under certification without requiring separate mapping processes for individual farms.</p> <p><i>For further information, see Guidance.</i></p>
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#### Indicator 4.1.4 – Comments from the public consultation

- General comments finding this indicator to be unclear with some citing the lack of access to the draft guidance being problematic.
- Suggestion to include an evaluation for how the company will be required to map areas of high conservation value - A complete study should be required only from companies that present high risk.
- Suggestion to allow the company to conduct the study without requiring validation of an HVC specialist which has a high cost.
  - Suggested wording: "High conservation value risk assessments (HCV) may be carried out by competent personnel from the certification units".
- Similarly to indicator 4.1.3, regarding the environmental impact study in areas of field expansion, suggestion that the expansion areas comply with the local agro-environmental zoning, without the need to carry out an environmental impact study, not least because if it does not meet the zoning, it cannot be implemented.
- Questions raised include:
  - In the case of HVC, if certification is achieved in early 2021, can this new change be applied?"
  - What will the tool look like? Will it be free? Will it be mandatory or if the plant has other mechanisms, is it possible to use them as well?"
  - Perhaps we should look at how we interact with HCV areas instead?
  - Can you assess the issue of compensation in farms that were altered so that the company can have a better option when choosing farms to certify? For example, if one hectare was cut on the farm to be certified, reforestation is carried out in another area of the company."

#### Indicator 4.1.4 – Changes made by the SRWG

- This indicator has been removed and merged into 4.1.1 and 4.1.2
- In collaboration with the HCV Resource Network, the SRWG has elected to revise the HCV indicators as follows:
  - Focus of 4.1.1 is the mill operator, with the verifier being the maps, whereby the maps provide the framework for identifying biodiversity/HCV priorities and the specific attributes (habitats and species), and therefore is an important resource for the grower to develop/implement their BESMP.
  - The development of BESMP now falls into 4.1.2 with growers developing and implementing BESMP, that account for risks to HCVs
  - Previous 4.1.4 on maintaining/enhancing HCVs in ongoing cultivation is removed and now integrated into 4.1.1 (supply base mapping) and 4.1.2 leading to implementation of grower BESM

<ul style="list-style-type: none"> <li>What will the tool look like? Will it be free? Will the use be mandatory or if the plant has other mechanisms, is it possible to use them as well?</li> </ul>			
Previous indicator (pre-public consultation)			
4.1. 5 – Across the whole supply area future expansion is conducted in non-HCV areas	Mill Agriculture	Yes	<p><b>CORE INDICATOR</b></p> <p>No expansion into natural ecosystems or on areas defined as HCVs. For greenfield expansion or new sugarcane projects the operator must conduct the “Bonsucro HCV Risk Assessment for expansion” for the planned areas and implement the HCV Risk Assessment procedures.</p> <p>This shall cover the whole supply area, centralized at the operation under certification without requiring separate mapping processes for individual farms.</p> <p><i>For further information, see Guidance.</i></p>
<p><b>Indicator 4.1.5 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>Mixed views on the clarity of this indicator - Some respondents highlighted the lack of guidance making it difficult to comment on the scope of applicability.</li> <li>Requests for more clarity around the issue of avoiding deforestation.</li> <li>A question was raised on whether the HCV Network be reviewing all of the assessments</li> </ul>		<p><b>Indicator 4.1.5 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 4.1.5 to 4.1.4</i></p> <ul style="list-style-type: none"> <li>Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>Note that the methodology for the Bonsucro HCV Risk Assessment for expansion is currently being developed by the HCV Network</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
4.1.4 – Across the whole cane supplying area future expansion is conducted in non-HCV areas.	<p>Mill Agriculture</p> <p><b>CORE INDICATOR</b></p> <p>whole cane supplying area</p>	Yes	<p>No expansion into natural ecosystems or on areas containing HCVs. For greenfield expansion or new sugarcane projects the grower operator conducts the “Bonsucro HCV Risk Assessment for expansion” for the planned areas and implement the HCV Risk Assessment procedures.</p> <p><i>For further information, see guidance.</i></p>

Previous indicator (pre-public consultation)			
4.1.6 Percentage of greenfield expansion or new sugarcane project covered by ESIA	Mill Agriculture	100%	<p><b>CORE INDICATOR</b> Applicable to major changes to the operation or field expansions (&gt;5% of total supply area or 1000 ha, whichever is smaller) or establishment of new sugar operations - changes shall be covered by ESIA. For further information, see Guidance.</p> <p><b>Guidance:</b> An ESIA process shall start prior to the formulation phase of a project, focus on significant issues and identify stakeholders to involve them, consider impacts on individuals with special consideration for vulnerable ones, and provide information on possible alternative or appropriate mitigation measures. Decisions shall be based on meaningful engagement with affected stakeholders (as defined by OECD), monitored and evaluated. The operator shall involve independent third party experts. A retrospective ESIA has to be carried out to expansions projects that happened within 12 months prior to initial certification.</p>
<p><b>Indicator 4.1.6 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests to clarify that this study should be for new projects or expansions only.</li> <li>➤ Need to define “new areas”.</li> <li>➤ Concerns that the removal of express mentions of FPIC from ESIA requirements implies an intention to avoid complying with FPIC. Respondents stressed that ESIA requirements should still be interpreted to incorporate an FPIC requirement.</li> <li>➤ A recommendation was put forward to conduct an HCV assessment (hopefully by an expert licensed by the HCV Network), so that the due diligence and public consultation with stakeholders will be undertaken and they can implement practices to protect these areas that are closely linked to the concept of HCV 6.</li> <li>➤ Simplified HCVs (not conducted by experts) should only apply to small independent producers, and not apply to large sugarcane companies.</li> <li>➤ Clear mention of prohibition on deforestation is still missing.</li> </ul>		<p><b>Indicator 4.1.6 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 4.1.6 to 4.1.5</i></p> <ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ HCV network assessments are not applicable to this indicator, but they are present in indicator 4.1.4</li> </ul>	

New indicator (post-public consultation with changes made by the SRWG)			
4.1.5 Percentage of greenfield expansion or new sugarcane project covered by ESIA	Mill Agriculture  CORE INDICATOR	100%	Applicable when there are major changes to the workforce (for example mechanisation) or field expansion (>5% of total supply area of 5 % rolling average, 1000has, whichever is smaller) or establishment of new sugar operations - changes are covered by ESIA.  <i>For further information, see guidance.</i>
<b>CRITERION</b>	<b>4.2 Soil Management Plan in place to avoid erosion and maintain and improve soil health</b>		
<p><b>General comments from the public consultation – Criterion 4.2</b></p> <ul style="list-style-type: none"> <li>➤ Several general comments were raised: <ul style="list-style-type: none"> <li>○ The term “Soil Management Units” is unclear. Request to have more details on what does it mean and how would it be managed</li> <li>○ No mention of encouraging intercropping/increased crop varieties and diversity of agricultural activity on the farm for income diversification/stabilization</li> <li>○ Soil analysis needs to be taken at regular interval as per the climatic season and inter cropping to understand how the behavioural pattern is</li> <li>○ Progressive implementation is essential given that there are factors outside of operational and financial control such as the issue of criminal burns (arson), the appearance of pests in areas with high incidences, etc.</li> </ul> </li> </ul>	<p><b>Criterion 4.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ This criterion was reviewed by the SRWG with input from an external soil expert group.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>		

INDICATOR	Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)			
4.2.1 - Mapping of soils and/or soil management units of the farm	Agriculture	Yes	<p><b>CORE INDICATOR</b> The operator must develop a Soil Management Plan (SMP) to ensure the prevention of soil degradation and erosion on the farm. This will be done by the operator mapping field boundaries and their soil type or soil management unit. Retention of crop residues and minimum tillage should be encouraged. <i>For more information see guidance</i></p> <p>Guidance: The SMP should highlight:</p> <ul style="list-style-type: none"> <li>• Soil types and management units defined.</li> <li>• Identification of soil constraints and crop limiting conditions such as potential rooting depth (or whether compaction problems exist), sodic and saline areas requiring amelioration, soil stone content and soil parent material.</li> </ul> <p>Topography including the maximum slope upon which it is safe to grow sugarcane</p>
<p><b>Indicator 4.2.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Most comments indicated that the indicator was clear, however there are a few considerations/questions which needed addressing: <ul style="list-style-type: none"> <li>➤ Soil mapping is a very expensive and time-consuming exercise a low cost-benefit ratio.</li> <li>➤ What is the scope of area to be covered?</li> <li>➤ Retention of crop residues and minimum tillage should be encouraged. However, it is unclear how mapping field boundaries and soil types etc prevents soil degradation and erosion.</li> <li>➤ This indicator assumes that all farms deal with erosion, but this may not be the case at all locations and therefore may not be relevant.</li> </ul> </li> </ul>		<p><b>Indicator 4.2.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator in collaboration with an external soil expert group and proposed some additional wording to clarify the scope of this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

New indicator (post-public consultation with changes made by the SRWG)			
4.2.1 Mapping of soils and/or soil management units of the farm	Agriculture  CORE INDICATOR	Yes	<p>The operator develops and implements a Soil Management Plan (SMP) that articulates the better management practices required for the operator to ensure the prevention of soil degradation and erosion of the farm's soils and to permit the optimal use of resources.</p> <p>The foundation for the SMP is laid by the operator mapping field boundaries and their soil management unit/s, which may include soil types. Practices aimed at preventing, mitigating, remedying and reducing soil degradation for each management unit are to be outlined.</p> <p><i>For more information see guidance</i></p>
<p><b>New indicator</b></p> <p>The SRWG has, in collaboration with an external soil expert group drafted the following indicator around the use of soil samples to develop objectives for soil health and crop nutrition</p> <p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>			
4.2.2 Soil samples are taken and used to develop objectives for soil health and crop nutrition programmes.	Agriculture	Yes	<p>The Soil Management Plan sets objectives for soil health by regular monitoring of dynamic soil properties that affect nutrition (soil fertility measures), monitoring of organic carbon (readily oxidisable or total) and/or properties linked to declines in crop performance (e.g. acidity, salinity/sodicity).</p> <p><i>For more information, see guidance.</i></p>
Previous indicator (pre-public consultation)			
4.2.2 - Health of the soil improved and maintained	Agriculture	80% of fields	<p>The Soil Management Plan must set objectives that include but not limited to:</p> <ul style="list-style-type: none"> <li>• Ensuring continuous ground cover (either by tops and leaves after harvest, cover crops, green manures, etc),</li> <li>• Adopting practices that minimize top soil disturbance (minimum tillage, controlled traffic, etc) and maximising the potential of cane to act as a carbon sink, and</li> <li>• Ensuring permanent cover of non-growing/tilled areas (verges, waterways, contour banks, etc.) with properly designed contours and waterways.</li> <li>• Identification and remediation of unfavourable soil and crop growth limiting conditions.</li> </ul> <p><i>For more information, see guidance</i></p>

			<p><i>Guidance:</i> Soil Management Plan shall accurately reflects all fields, taking into account parameters such as soil uniformity and farm size</p>
<p><b>Indicator 4.2.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Most comments stated that the indicator is unclear and that the guidance is needed.</li> <li>➤ A question was asked on the calculation methodology and how the 80% would be determined.</li> <li>➤ A question was also raised on whether each set objective must also meet 80% of the area of scope?</li> <li>➤ Finally, continuous ground cover is not recommended for poorly drained areas and areas subject to flooding.</li> </ul>		<p><b>Indicator 4.2.2 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 4.2.2 to 4.2.3</i></b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator in collaboration with an external and proposed some new wording to clarify the verifier of this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>4.2.3 Health of the soil improved and maintained through setting objectives and implementing appropriate BMPs</p>	<p><i>Agriculture</i></p>	<p><i>Yes for each</i></p>	<p>Soil Management Plan shall identify better management practices (BMP's) that aim to enhance soil health and are based on soil sampling and analysis, and set objectives for improving and maintaining soil health in the following categories: Soil cover Organic matter Soil acidity Salinity/Sodicity</p> <p><i>For more information, see guidance</i></p>
<p><b>Previous indicator (pre-public consultation)</b></p>			
<p>4.2.3 – Health of the soil as determined by labile carbon, pH, acidity and salt load to be measured and recorded</p>	<p>Agriculture</p>	<p>Yes for each</p>	<p>Based on the Soil Management Plan, the operator shall measure the levels of:</p> <ul style="list-style-type: none"> <li>• labile carbon and report the labile carbon measured per soil type, time of year and management practice.</li> <li>• pH, acidity and/or salinity/sodicity status must be measured per field.</li> </ul> <p><i>For more information, see guidance</i></p>

<p><b>Indicator 4.2.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Many respondents questioned the need to measure labile carbon.             <ul style="list-style-type: none"> <li>➤ Respondents felt that measuring labile carbon is expensive and not standard practice and therefore organic carbon would be a better and more practical measure.</li> <li>➤ Some also questioned the capacity to measure labile carbon since it is dynamic in nature and dependent on soil moisture.</li> </ul> </li> <li>➤ A few comments mentioned the need to include guidance on the frequency of the analyses. There is already a significant number of analyses required by environmental agencies, vinasse application plan etc.</li> </ul>		<p><b>Indicator 4.2.3 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator in collaboration with an external soil expert group and has removed it from the standard (merged with 4.2.2)</li> <li>➤ Labile carbon references have been replaced with organic carbon</li> </ul>	
<p><b>Previous indicator (pre-public consultation)</b></p>			
<p>4.2.6 - Ratio of fertiliser N P K applied to fertilizer N P K recommended by soil or leaf analysis</p>	<p>Agriculture</p>	<p>&lt;1.05 for each nutrient Ratio applied to recommended</p>	<p><b>CORE INDICATOR</b>          Fertiliser applied according to soil or leaf analysis (N P K content).          The operator should have a sampling plan which is based on the Soil Management Plan that accurately reflects all fields, taking into account parameters such as soil uniformity and farm size. Soil testing should determine the levels of:</p> <ul style="list-style-type: none"> <li>• Macro nutrients (Nitrogen, Phosphorus and Potassium)</li> <li>• Organic carbon content</li> <li>• Soil pH and acidity</li> <li>• Texture (proportions of sand, silt, clay)</li> </ul> <p>Fertiliser recommendation shall be made according to local industry recognised best practices, and to include the application of chemical and organic fertilizer.  <i>For further information, see Guidance.</i></p> <p>Guidance: Any soil sampling should be done prior to the growth season, with samples being taken in a representative way to ensure analysis accurately reflects conditions.          Selected soil tests should be carried out at least every five years in the same fields to evaluate any potential long-term impact on soil fertility from sugar production. The same sampling methodology/protocol must be followed from one sampling event to the next.</p>

			<p>The operator should ensure crop nutrient requirements are used to develop crop nutrition programme for local conditions to achieve optimal production yield and quality.</p> <p>The amount of Nitrogen, Potassium and Phosphorus applied through fertilisers within a season should be determined by actual and target crop nutrient supply, taking into account all sources of nutrients already available to the crop. This should include:</p> <ul style="list-style-type: none"> <li>▪ Nutrients inherent in the soil</li> <li>▪ Nutrients derived from previous fertiliser applications (including manure)</li> <li>▪ Nutrients derived from harvest residues</li> <li>▪ Nutrients provided by other crops, such as legumes, green manures and cover crops, mill mud and mill ash</li> </ul> <p>Fertiliser shall be of an appropriate type applied at the correct rate, time and placement for optimal crop use.</p>
<p><b>Indicator 4.2.6 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Several questions were raised: <ul style="list-style-type: none"> <li>➤ Will the analysis of this indicator be based on the volume applied or the soil analysis? The description is confusing as to what should be analysed from the soil versus indicator.</li> <li>➤ Highlight whether this indicator assesses the quantity applied annually (calculator period) or by harvest cycle.</li> <li>➤ Do all recommendations have to be based on soil analysis?</li> <li>➤ Are the fertilization recommendations based on theoretical tests and exports sufficient where it is necessary to have recommendations absolutely based on soil analysis?</li> </ul> </li> <li>➤ Suggestion to clarify in the guidance how the recommendations should be calculated, taking into account the general context of the area, including the quantities of nutrients exported by the cultivation, to “add back” the nutrients lost.</li> </ul>			<p><b>Indicator 4.2.6 – Changes made by the SRWG</b></p> <p><i>Please note that the indicator number has changed from 4.2.6 to 4.2.5</i></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator in collaboration with an external and proposed some new wording to clarify the scope of this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
4.2.5 Ratio of fertiliser N P K applied to fertilizer N P K	Agriculture	<1.10 for each nutrient	<p>The Soil Management Plan sets objectives for fertiliser to be applied according to soil analysis.</p> <p>Applied fertiliser should not exceed 10% of the recommended fertiliser for the farm.</p>

recommended by soil analysis (Previously 4.2.6)	CORE INDICATOR	(Ratio applied to recommended)	<i>For more information, see guidance.</i>
Previous indicator (pre-public consultation)			
4.2.4 Practices minimise and control erosion and degradation of soils	Agriculture	80% of fields	<p>To ensure that there is no erosion or degradation taking place in sugarcane fields, the Soil Management Plan should consider and implement, where relevant, but not limited to:</p> <ul style="list-style-type: none"> <li>• Compliance with relevant regulations aimed at limiting soil erosion</li> <li>• Guidance on contour planting</li> <li>• Use of terraces or strip planting</li> <li>• Use of minimum or conservation tillage</li> <li>• Use of mulch/trash</li> <li>• Use of cover crops or green manures</li> <li>• Application and retention of organic matter</li> <li>• Use of windbreaks</li> <li>• Use of buffer strips (to reduce water flow)</li> <li>• Installation of drainage and waterflow control measures to avoid water-logging</li> <li>• Avoiding the use of machinery on wet soil</li> <li>• Use of machinery with extended reach or low-pressure tyres</li> <li>• Limits on machine weight</li> <li>• Use of permanent vehicle routes (controlled traffic)</li> <li>• Irrigation water analysis to assess potential salt loading that may lead to salinity and sodicity</li> </ul> <p>Ensure proper irrigation scheduling and monitoring and remediation of excess salt loads due to irrigation. Corrective action should be taken wherever soils have been damaged by erosion, compaction or loss of organic matter.</p> <p><i>For more information, see guidance</i></p>
<b>Indicator 4.2.4 – Comments from the public consultation</b>		<b>Indicator 4.2.4 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Very few comments received for this indicator.</li> <li>➤ Generally, the requirements of the indicator are not clear.</li> </ul>		<p><b><i>Please note that the indicator number has changed from 4.2.4 to 4.2.6</i></b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator in collaboration with an external and proposed some new wording to clarify the scope of this indicator</li> </ul>	

<p>One comment highlighted that the pH value at higher levels are directly associated with the saturation of sodium and magnesium bases, and not only with the pH value.</p>			<p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>
<p>New indicator (post-public consultation with changes made by the SRWG)</p>			
<p>4.2.6 Practices to minimise and control soil erosion and compaction.  (Previously 4.2.4)</p>	<p>Agriculture</p>	<p>Yes</p>	<p>The Soil Management Plan identifies practices that mitigate and minimise soil erosion, compaction and loss of organic matter taking place in sugarcane fields, and sets objectives for implementing remedial and mitigation actions.  <i>For more information, see guidance.</i></p>
<p>Previous indicator (pre-public consultation)</p>			
<p>4.2.5 - Burning of sugarcane tops and leaves after harvest is prevented</p>	<p>Agriculture</p>	<p>0 ha</p>	<p>No burning of mulch after harvest except where this would be required for field cultivation for replanting. If sugarcane is burnt prior to harvest, it shall be done so only with cold-burning. Tops must be retained and evenly scattered.  <i>For further information, see Guidance.</i></p>
<p><b>Indicator 4.2.5 – Comments from the public consultation</b></p> <p>➤ Suggestion to include conducting independent studies on the impacts of the sugar cane production chain on the soil, water, vegetation, workers, and surrounding communities, due to health risk to workers and surrounding communities.</p>		<p><b>Indicator 4.2.5 – Changes made by the SRWG</b></p> <p><b><i>Please note that the indicator number has changed from 4.2.5 to 4.2.7</i></b></p> <p>➤ The SRWG has reviewed this indicator in collaboration with an external and proposed some new wording to clarify the scope of this indicator</p> <p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>	
<p>New indicator (post-public consultation with changes made by the SRWG)</p>			

<p>4.2.7 Burning of sugarcane tops and leaves after harvest is prevented</p> <p>(Previously 2.4.5)</p>	<p>Agriculture</p>	<p>Yes</p>	<p>This only applies to fields which have been burnt prior to harvest (ie no green cane harvesting). No burning of mulch/trash blanket after harvest except where this would be required for field cultivation for replanting. If sugarcane is burnt prior to harvest, it is done so only with cool burns (or also referred to as “cool-burning’). Tops must be retained and evenly scattered.</p> <p><i>For more information, see guidance.</i></p>
<p>Previous indicator (pre-public consultation)</p>			
<p>4.2.7 - Percentage fields with samples showing analyses within acceptable limits for acidity or corrected</p>	<p>Agriculture</p>	<p>&gt; 80%</p>	<p>To ensure the maintenance of an optimum soil pH. Sampling to be carried out at least once per crop cycle, ideally at replanting. Although the acceptable pH (CaCl<sub>2</sub>) range is between 5.0 and 8.0, soils with pH not at optimum levels shall be corrected based on soil analyses to determine soil acidity and the amount of liming material required for amelioration using industry best practices. Records must be maintained.</p> <p>There is no need to retest the soil after corrections are applied where these are based on the initial soil sampling and recommendations are applied. Retesting should be done at least every 5 years.</p> <p><i>For further information, see Guidance</i></p>
<p><b>Indicator 4.2.7 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Some of the questions and suggestions raised were: <ul style="list-style-type: none"> <li>➤ Will indicator 4.2.7 have any modifications to the calculator?</li> <li>➤ This indicator can be better evaluated if it is lowered to 60% - 70%.</li> <li>➤ Clarify the frequency. Should the analysis be carried out once per cultivation cycle? Annually or every 5 years?</li> </ul> </li> <li>➤ It was pointed out that Bonsucro needs to consider the nature and properties of the soil (its mineralogy), as there are soils which, by their very nature, have pH with specifications that are outside the norm (calcareous, acidic soils). Extol means that there are soils that cannot be corrected. One respondent highlights</li> </ul>		<p><b>Indicator 4.2.7 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator in collaboration with an external soil expert group and has removed it from the standard.</li> </ul>	

that this is an indicator that will be difficult to comply with, because their soils are very acidic and it is impossible to reach the parameter stipulated in the calculator.

## CRITERION

### 4.3. Water Stewardship Plan in place

#### General comments from the public consultation – Criterion 4.3

- General need for more guidance and details to adequately assess this criterion
- Suggestions proposed for this criterion:
  - Consider the national regulations on this issue: the mills have state authorization to use the water resource.
  - Define the applicability of the dissolved oxygen measurement for those organizations that reuse water for crop irrigation rather than discharging directly to stream.
  - Indicate the percentage of dissolved oxygen allowed for the use of effluent waters

#### Criterion 4.3 – Changes made by the SRWG

- Guidance has been developed setting out the methodologies and expectations around compliance with this indicator (see annex 2 of the standard)
- Dissolved Oxygen measurement and threshold defined in indicator 4.3.6

## INDICATOR

### Scope

### Standard

### Full indicator wording

#### Previous indicator (pre-public consultation)

4.3.1 – Mapping of water resources and catchment areas and setting objectives for water stewardship

Mill  
Agriculture

100%

#### CORE INDICATOR

The operator shall develop a Water Stewardship Plan (WSP) with achievable actions, agreed responsibilities, timeframes and allocated resources. The WSP should reflect continuous improvement and organisational learning principles. As a minimum, it will include the following:

- map all water resources (including catchment areas) and define their level of availability (water stress)

- Map other users of water utilising mapped catchment areas (depending on level of complexity, this can be aggregated by user category such as local authorities supplying water, other crops, mining, etc )
- Map local water initiatives and list organisations involved in water management

Shall cover the whole supply area, centralized at the operation under certification without requiring separate mapping processes for individual farms.  
For more information, see guidance

#### Indicator 4.3.1 – Comments from the public consultation

- Need for clear guidance on collaborative actions.
- Question around whether the water stewardship guidance references the AWS (Alliance for Water Stewardship).
- The Identification of other users outside the organization using the catchment areas should not be the responsibility of the operator.
- One respondent highlighted the link between this indicator and indicator 1.1. 4.3.2 should be included as a requirement for the entire supply base, since this is a landscape analysis.
- Suggestion that the indicator includes the participation in a regional water management initiative.
- Suggestion to re-word indicator 4.3.1 to “Identify the basin, sub-basin or micro-basin where the water resource is provided and determine an action plan to contribute to its sustainability.”

#### Indicator 4.3.1 – Changes made by the SRWG

- The SRWG has reviewed this indicator in collaboration with an external water expert (AWS) and has elected to include basin, sub-basin and micro-basin as main water resources operators must identify
- Guidance has been developed setting out the expectations around compliance with this indicator including collaborative action (see annex 2 of the standard)

New indicator (post-public consultation with changes made by the SRWG)

<p>4.3.1 Identify main water resources, catchment areas where the water resource is provided and develop and implement an action plan to contribute to its sustainability and setting objectives for water stewardship.</p>	<p>Mill Agriculture</p> <p>CORE INDICATOR</p> <p>Whole cane supplying area</p>	<p>Yes</p>	<p>The operator develops and implements a Water Stewardship Plan (WSP) with achievable actions, agreed responsibilities, timeframes and allocated resources. The WSP reflects continuous improvement and organisational learning principles. As a minimum, it will include the following:</p> <ul style="list-style-type: none"> <li>• identify mainwater resources (including catchment areas, basin, sub-basin or microbasin), define their level of availability (water stress), and set objectives for water stewardship</li> <li>• Map other users of water utilising mapped catchment areas (depending on level of complexity, this can be aggregated by user category such as local authorities supplying water, other crops, mining, etc.)</li> <li>• Map local water initiatives and list organisations involved in water management</li> </ul> <p>Covers the whole cane supplying area, centralized at the operation under certification without requiring separate mapping processes for individual farms.</p> <p><i>For more information, see guidance.</i></p>
<p>Previous indicator (pre-public consultation)</p>			
<p>4.3.2 Mapping of land/water titles &amp; claims is conducted</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p>The operator shall demonstrate statutory and customary land and water rights wherever applicable. The operator shall also map the documents needed to demonstrate statutory and customary land and water rights in the supply area outside the unit of certification. The operator must have a system in place to track supplier compliance with the stated documents and encourage compliance.</p> <p>The operator shall conduct a physical mapping of claims on land &amp; water and articulate how claims are to be handled in line with processes laid out in the Guidance. Claim mapping shall cover the whole supply area of the certified entity. When land rights have been relinquished to the benefit of the operator, the operator shall demonstrate the decision was taken by Free Prior Informed Consent and negotiated.</p> <p><i>For further information, see Guidance.</i></p> <p>Guidance: Legal ownership shall be the official title in the country or equivalent (e.g. notary, government agency or other). Rights to water refer to the right to extract &amp; use water, including cap on quantity extracted. Customary rights can be evidenced in other forms by a local statutory or customary body. Guidance for customary rights is provided in ILO Conventions 169 and 117.</p>
<p><b>Indicator 4.3.2 – Comments from the public consultation</b></p> <p>➤ Some comments highlighted that the demonstration of FPIC is not a key requirement in Indicator 4.3.2 (which is not a core indicator as well), and hence may not be subject to the requirement of “full compliance.” Ensuring an FPIC-</p>		<p><b>Indicator 4.3.2 – Changes made by the SRWG</b></p> <p>➤ No changes were made to this indicator</p> <p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>	

<p>compliant process with meaningful stakeholder engagement can best be achieved by financing technical support to each affected community. Community access to such technical expertise and support would be facilitated by a requirement for relevant operators to make regular contributions into a Basket Fund.</p>			
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>4.3.2 Mapping of land/water titles &amp; claims is conducted.</p>	<p>Mill Agriculture  Whole Cane supplying area</p>	<p>Yes</p>	<p>The operator demonstrates statutory and customary land and water rights wherever applicable. The operator also maps the documents needed to demonstrate statutory and customary land and water rights in the cane supplying area outside the unit of certification. The operator has a system in place to track supplier compliance with the stated documents and encourage compliance. The operator conducts a physical mapping of claims on land &amp; water and articulates how claims are to be handled in line with processes laid out in the Guidance. Claim mapping covers the whole cane supplying area of the certified entity. When land rights have been relinquished to the benefit of the operator, the operator demonstrates the decision was taken by Free Prior Informed Consent and negotiated.</p> <p>Also see indicator 1.4.2 in Principle 1.</p> <p><i>For further information, see guidance.</i></p>
<p><b>Previous indicator (pre-public consultation)</b></p>			
<p>4.3.3 – Engaging in collaborative action to promote sustainable water use</p>	<p>Mill Agriculture</p>	<p>Yes</p>	<p>When water resources are stressed, the operator shall document its engagement in collaborative and collective action to promote sustainable water use and participation with other water users, government and civil society in catchment or aquifer water planning and management including in how to allocate water equitably and without conflict</p> <p><i>For further information, see Guidance.</i></p>
<p><b>Indicator 4.3.3 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Several comments highlighted the difficulty of expanding the scope beyond the unit of certification. <ul style="list-style-type: none"> <li>➤ Concerns that implementation would be challenging as other water users may not be cooperative with the mill.</li> </ul> </li> </ul>		<p><b>Indicator 4.3.3 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ No changes were made to this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<ul style="list-style-type: none"> <li>➤ On the other hand, other respondents recommended including the entire supply base, since sustainable water use is linked to landscape management, customary rights, etc.</li> <li>➤ A general question was raised: How can the mill determine what is a reasonable amount of water to be used by a third party?</li> </ul> <p>A suggestion was made to further investigate (via a poll with current certified producers) if it is even possible for 4.3.3 to be implemented for the ENTIRE supply area. If found to be unfeasible, Bonsucro should limit the scope of application to unit of certification.</p>			
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
4.3.3 – Engaging in collaborative action to promote sustainable water use	Mill Agriculture	Yes	When water resources are stressed, the operator documents their engagement in collaborative and collective action to promote sustainable water use and participation with other water users, government and civil society in catchment or aquifer water planning and management including in how to allocate water equitably and without conflict <i>For further information, see Guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
4.3.4 Net water consumed per unit mass of product	Mill	<20 for sugar only or <30 for ethanol  Kg of water/kg of mass product	Water consumed at mill = water used less water returned to the environment. If effluents are exported by the mill to the fields for irrigation, the mill shall account for it as water returned to the environment. <i>For further information, see Guidance.</i>
<b>Indicator 4.3.4 – Comments from the public consultation</b>		<b>Indicator 4.3.4 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Clarification needed on whether it is necessary to define the types of water that is used vs the those that are returned to the environment, such as evaporation.</li> </ul>		<ul style="list-style-type: none"> <li>➤ No changes were made to this indicator</li> </ul>	

<p>➤ Another comment highlighted that the indicator did not consider water from sugarcane. It was suggested that the indicator measures the efficiency with the water that is being used to irrigate the crop.</p>		<p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p> <p>➤ Indicator 4.3.5 captures the efficiency of the water being used to irrigate the crop.</p>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>4.3.4 Net water consumed per unit mass of product</p>	<p>Mill</p>	<p>&lt;20 for sugar only or &lt;30 for ethanol</p> <p>Kg of water/kg of mass product</p>	<p>Water consumed at mill = water used less water returned to the environment. If effluents are exported by the mill to the fields for irrigation, the mill accounts for it as water returned to the environment. <i>For further information, see Guidance.</i></p>
<p><b>Previous indicator (pre-public consultation)</b></p>			
<p>4.3.5 – Irrigation Water Productivity -</p>	<p>Agriculture</p>	<p><math>\geq 66 + 0.05 \times \text{Rainfall}</math> (kg/ha)/mm</p>	<p>To ensure irrigated water is used efficiently. Relies on a direct measure of all waters applied to the fields (including extracted waters, recycled waters, diluted vinasse, and diluted effluents) and rainfall. <i>For further information, see Guidance.</i></p> <p>Guidance: An equation that could be used in a calculator: <math>WP = 66 + 0.05 \times \text{Rain}</math> Rainfall is expressed in mm</p>
<p><b>Indicator 4.3.5 – Comments from the public consultation</b></p> <p>➤ Need for further clarification on the formula used to calculate water productivity (WP). For instance:</p> <ul style="list-style-type: none"> <li>➤ What does the value 66 represent?</li> <li>➤ Why is it only rain that is considered? Rain, irrigation, and yield are all needed to calculate the specific farm performance, and all should be measured for the season.</li> </ul>		<p><b>Indicator 4.3.5 – Changes made by the SRWG</b></p> <p>➤ The SRWG has reviewed this indicator in collaboration with an external water expert (AWS) and has proposed changes for clarity (including definition of Water Productivity and method for calculation <math>WP_a &gt; WP_o</math>)</p> <p>➤ Guidance has been developed setting out the exact methodology and expectations around compliance with this indicator (see annex 2 of the standard)</p>	

<ul style="list-style-type: none"> <li>➤ How will irrigation be included in the WP formula?</li> <li>➤ Should all liquids applied in the field (m<sup>3</sup>/ha) be greater than the WP formula described?</li> </ul>			
New indicator (post-public consultation with changes made by the SRWG)			
4.3.5 Irrigation Water Productivity	Agriculture	WPa ≥ WPo	<p>To ensure irrigated water is used efficiently.</p> <p>Water productivity (WP) is a measure of how effectively irrigation water is used to produce sugarcane. WP equals the cane yield harvested (t/ha), divided by the net irrigation applied over the growing season (mm).</p> <p>Irrigation water productivity is strongly influenced by the amount of rain received. This relationship is expressed as the <u>benchmark water productivity</u> - WPo</p> <p>Actual cane yield and net irrigation applied over the growing season (mm) will determine <u>actual water productivity</u> value - WPa.</p> <p><i>For further information, see guidance.</i></p>
Previous indicator (pre-public consultation)			
4.3.6 - Dissolved oxygen in effluent point	Mill	≥2.5 PPM Or 1 Kg COD / T product or 0.25 kg/T BOD	<p>Dissolved oxygen is an indicator of the quantity of oxygen available in the receiving stream to support life. Sampling should be carried at the discharging point.</p> <p>For further information, see Guidance.</p>
<b>Indicator 4.3.6 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Requests that compliance with national legislation should take precedence to the standard.</li> </ul>		<b>Indicator 4.3.6 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ No changes were made to this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	

<ul style="list-style-type: none"> <li>➤ Questions were raised on:             <ul style="list-style-type: none"> <li>➤ How to promote the sustainable use of water through collaborative action when there is no influence?</li> <li>➤ What types of evidence would be required in the audit? For example, in the case of 4.3.6, perhaps an average of dissolved oxygen measurements in rivers and streams monitored by the mill?</li> </ul> </li> </ul>	
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New indicator (post-public consultation with changes made by the SRWG)
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4.3.6 - Dissolved oxygen in effluent point	Mill	$\geq 2.5$ PPM Or 1 Kg COD / T product or 0.25 kg/T BOD	Dissolved oxygen is an indicator of the quantity of oxygen available in the receiving stream to support life. Sampling should be carried at the discharging point.  For further information, see Guidance.
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CRITERION	4.4 - Agro-ecological Pest, Disease and Weed Management Plans in place
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<p><b>General comments from the public consultation – Criterion 4.4</b></p> <ul style="list-style-type: none"> <li>➤ General agreement on the criterion requirements being clear and that the criterion adds value</li> <li>➤ Concern over the integrated pest management practices where there is a risk that the compliance in practice is limited to a safe pesticide use evaluation.</li> <li>➤ Clarifications needed as to whether the scope of the agro-ecological plan included control of pests, diseases, and weeds.</li> <li>➤ Regarding hazardous pesticides:</li> </ul>		<p><b>Criterion 4.4 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>
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- Suggestion that the list of allowed products considers the requirements for use in the country, stating whether they have been approved or prohibited.
- Question around what should be done considering that Hazardous or banned pesticides are available in developing countries.
- Concerns over the increase of cost in using products that are less effective. Suggestion to allow use of substances that are legal in the country of operation.
- The standard should consider the way/method of application since aerial application of herbicides harm the people living in surrounding communities and even to other crops.



INDICATOR	Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)			
4.4.1 – Identification and monitoring of current, historical and potential pests and diseases	Agriculture	80% of area	<p><b>CORE INDICATOR</b></p> <p>The operator shall identify current, historical and potential pests, including weeds affecting the fields, defining for each the threshold for when control of pests becomes necessary. This shall be carried out through field monitoring. The operator shall conduct field monitoring of plant health, pests and beneficial organisms. The plan shall cover the whole supply area, centralized at the operation under certification without requiring separate identification processes for individual farms. For further information, see Guidance.</p> <p>Guidance: This should particularly target new plantations, new sugarcane areas to prevent any population outbreaks, or disease spreading. Information centralized at the operation under certification without requiring separate identification processes for individual farms.</p>
<b>Indicator 4.4.1 – Comments from the public consultation</b>			<p><b>Indicator 4.4.1 – Changes made by the SRWG</b></p> <p>➤ No changes were made to this indicator</p>

<p>➤ Clarifications are needed on the scope i.e. how 80% coverage is measured.</p> <ul style="list-style-type: none"> <li>➤ For example, to implement biological control whenever possible, in 80% of the area?</li> <li>➤ Or if it is applied in an area, one time per cycle is enough?</li> <li>➤ Or is it 80% of the unit of certification or of the total supply area? One respondent also asks to consider gradual implementation of the indicator if the scope is the supply area.</li> </ul>		<p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>4.4.1 Identification and monitoring of current, historical and potential pests and diseases</p>	<p>Agriculture</p> <p><b>CORE INDICATOR</b></p> <p>Whole cane supplying area</p>	<p>80% of area</p>	<p>The operator identifies current, historical and potential pests, including weeds affecting the fields, and where appropriate, defining for each the threshold for when control of pests becomes necessary. This is carried out through field monitoring.</p> <p>The operator conducts field monitoring of plant health, pests and beneficial organisms.</p> <p>The plan covers the whole cane supplying area, centralized at the operation under certification without requiring separate identification processes for individual farms.</p> <p><i>For further information, see guidance.</i></p>
<p><b>Previous indicator (pre-public consultation)</b></p>			
<p>4.4.2 - Agro-ecological pest and disease management practices implemented</p>	<p>Agriculture</p>	<p>80% of area</p>	<p>The operator shall develop an Agro-ecological Pest and Disease Management Plan (AP&amp;DM) and implement good agro-ecological pest practices to prevent the build-up of harmful pest populations and minimize economic loss. These include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Use more resistant varieties of sugarcane and clean seedcane as planting source</li> <li>• Implementing Biological control wherever is possible</li> <li>• Promoting conservation biocontrol to preserve natural enemies</li> <li>• Encourage the use of cover crops or trash blanketing</li> <li>• Encourage the presence of natural vegetation around sugarcane fields particularly flowers attracting natural enemies of pests</li> </ul> <p><i>For further information, see Guidance.</i></p>

<b>Indicator 4.4.2 – Comments from the public consultation</b>		<b>Indicator 4.4.2 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Suggestions that a protocol for rodenticide use should be developed. This can be part of a comprehensive pest plan and inserted as an annex for Central America.</li> <li>➤ Another suggestion was to include a progressive implementation plan to lessen the economic impact of compliance.</li> <li>➤ Questions were raised on what the accepted measurement values will be for the development of this agro-ecological plan, with clarification on the types of agrochemicals and which operations will be monitored in these indicators.</li> <li>➤ Need for more clarity on the frequency of the identification or study.</li> </ul>		<ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator and has proposed new wording for clarity</li> <li>➤ The guidance is global and generic in focus by nature. Bonsucro is actively working with its members in the region to support the successful implementation of the standard according to their local specificities. This might include in future, dedicated guidance for rodenticide use in central America.</li> <li>➤ Guidance has been developed setting out the methodology and expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
4.4.2 Pest and disease management practices implemented	Agriculture	80% of area	<p>The operator uses a pest and disease management plan that integrates agronomic, biological and chemical strategies appropriate to the target species and farming system to minimise the economic impact of pests and diseases and minimise off-site impacts.</p> <p><i>For further information, see guidance.</i></p>
<b>Previous indicator (pre-public consultation)</b>			
4.4.3 - Integrated Weed Management plan	Agriculture	80% of area covered by	<p>The operator shall develop an Integrated Weed Management Plan (IWMP) that defines the threshold for when chemical control of weeds becomes necessary, and considers the following, but not limited to:</p> <ul style="list-style-type: none"> <li>• the use of chemicals (especially those with broad-spectrum activity) should be seen as a last resort</li> <li>• practicing field hygiene by preventing the spread of mature seed or runners</li> <li>• adoption of field practices that minimise risk of waterlogging and reduced soil aeration (e.g. controlled traffic, organic matter inclusion, proper drainage), as anoxic soil conditions lead to reduced microbial degradation of some herbicides and increased residual activity.</li> <li>• green manure following</li> <li>• certain tillage operations e.g. disking to be incorporated if they can be a valuable component of IWM.</li> </ul>

			<i>For further information, see Guidance.</i>
<b>Indicator 4.4.3 – Comments from the public consultation</b>  Most comments were asking about how to measure 80% and the types of agrochemicals and which operations will be monitored in these indicators.		<b>Indicator 4.4.3 – Changes made by the SRWG</b>  <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator and has proposed new wording for clarity as well as a reference to the economic impact of weeds</li> <li>➤ Guidance has been developed setting out the methodology and expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
4.4.3 Integrated Weed Management plan	Agriculture	80% of area covered by	The operator uses a weed management plan that integrates agronomic and biological strategies appropriate to the target species and farming system (integrating chemical strategies as a last resource) to minimise the economic impact of weeds and minimise off-site impacts.  <i>For further information, see guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
4.4.4 - Agro-chemicals applied per hectare per year	Agriculture	<5 kg active ingredient / ha/year	<b>CORE INDICATOR</b> To minimise air, soil and water contamination, particularly off-site impacts.. Quantities of active ingredients of agro-chemicals (including pesticides, herbicides, insecticides, fungicides, nematicides, ripeners) applied. Also note the requirement to use only products registered for use and at registered rates. Use in accordance with label directions.  <i>For further information, see Guidance.</i>

<b>Indicator 4.4.4 – Comments from the public consultation</b>		<b>Indicator 4.4.4 – Changes made by the SRWG</b>	
<ul style="list-style-type: none"> <li>➤ Suggestion to include a clear explanation of how to calculate the indicator in the guidance.</li> <li>➤ Request for Bonsucro to evaluate the possibility of increasing the limit to 5.5 kg/ha.</li> <li>➤ Concern that the amount of pesticide &lt;5 kg a.i./Ha/year is a verifiable standard, but not necessarily the best.</li> <li>➤ Suggestion that the application of the indicator is carried out according to the presence of weeds and conditions and type of soil.</li> </ul>		<ul style="list-style-type: none"> <li>➤ No changes were made to this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ After extensive consultation with experts in the field, there is no suitable globally applicable alternative to change the metric threshold.</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			
4.4.4 - Agro-chemicals applied per hectare per year	Agriculture  <b>CORE INDICATOR</b>	<5 kg active ingredient / ha/year	To minimise air, soil and water contamination, particularly off-site impacts. Quantities of active ingredients of agro-chemicals (including pesticides, herbicides, insecticides, fungicides, nematocides, ripeners) applied. Also note the requirement to use only products registered for use and at registered rates. Use in accordance with label directions.  For further information, see Guidance.
<b>Previous indicator (pre-public consultation)</b>			
4.4.5 - Banned agro-chemicals applied per hectare per year	Agriculture	0 kg active ingredient/h a/y	<b>CORE INDICATOR</b> Quantities of active ingredients of agro-chemicals included in: . <ul style="list-style-type: none"> <li>A. Pesticide formulations that meet the criteria of classes Ia (extremely hazardous) or Ib (highly hazardous) of the WHO Recommended Classification of Pesticides by Hazard;</li> <li>B. Pesticide active ingredients and their formulations that meet the criteria of carcinogenicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS);</li> <li>C. Pesticide active ingredients and their formulations that meet the criteria of mutagenicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS);</li> </ul>

			<p>D. Pesticide active ingredients and their formulations that meet the criteria of reproductive toxicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals;</p> <p>E. Pesticide active ingredients listed by the Stockholm Convention in its Annexes A and B, and those meeting all the criteria in paragraph 1 of Annex D of the Convention;</p> <p>F. Pesticide active ingredients and formulations listed by the Rotterdam Convention in its Annex III;</p> <p>G. Pesticides listed under the Montreal Protocol;</p> <p><i>For further information, see Guidance.</i></p> <p><b>Guidance:</b> In cases where there are no non-banned alternatives legally registered for use, research should be conducted and documented to determine this, taking into consideration alternative chemical or non-chemical controls can be used. If this research confirms that no non banned chemical or non-chemical alternatives are available, the use of a banned agrochemical is tolerated. In these cases risk management plans must be updated to control the risks arising from applying a potentially dangerous chemical, as well as a plan to phase out or eliminate the use of banned agrochemicals.</p>
<p><b>Indicator 4.4.5 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Suggestions to allow national legislation to take precedence over the standard.</li> <li>➤ A question was raised on whether an exception on the use of insecticides could be made in the advent of a locust infection.</li> <li>➤ Another question was raised asking what to do when there are no alternatives (that are not banned) available in the country.</li> </ul>		<p><b>Indicator 4.4.5 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ No changes have been made to this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ Note that when national legislation goes against one of the international conventions, protocol or WHO lists, by allowing only banned agrochemicals and therefore when no non-banned alternative is allowed by legislation, the national legislation shall be complied with</li> </ul>	
<p>New indicator (post-public consultation with changes made by the SRWG)</p>			
<p>4.4.5 - Banned agro-chemicals applied per hectare per year</p>	<p>Agriculture</p> <p><b>CORE INDICATOR</b></p>	<p>0 kg active ingredient/h a/y</p>	<p>Quantities of active ingredients of agro-chemicals included in:</p> <p>H. Pesticide formulations that meet the criteria of classes Ia (extremely hazardous) or Ib (highly hazardous) of the WHO Recommended Classification of Pesticides by Hazard;</p> <p>I. Pesticide active ingredients and their formulations that meet the criteria of carcinogenicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS);</p>

			<p>J. Pesticide active ingredients and their formulations that meet the criteria of mutagenicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals (GHS);</p> <p>K. Pesticide active ingredients and their formulations that meet the criteria of reproductive toxicity Categories 1A and 1B of the Globally Harmonized System on Classification and Labelling of Chemicals;</p> <p>L. Pesticide active ingredients listed by the Stockholm Convention in its Annexes A and B, and those meeting all the criteria in paragraph 1 of Annex D of the Convention;</p> <p>M. Pesticide active ingredients and formulations listed by the Rotterdam Convention in its Annex III;</p> <p>N. Pesticides listed under the Montreal Protocol;</p> <p><i>For further information, see Guidance.</i></p>
<b>CRITERION</b>	<b>4.5 - To ensure hazardous chemicals and materials do not negatively impact biodiversity and ecosystem services</b>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
4.5.1 - Management of storage and handling facilities for farm chemicals, fuel, lubricants, hazardous materials to prevent pollution	Mill Agriculture	<u>100%</u>	<p><b>CORE INDICATOR</b></p> <p>Agrochemical and other chemical are safely stored, access is restricted to the sole users, storage area is ventilated and allows for spillage management (such as a retention pond, etc)</p> <p>The operator must ensure that Agrochemicals and Fertilisers are stored securely on its supplying farms and in a manner that prevents unauthorised access and protects the environment in the event of spillage.</p> <p><i>For further information, see Guidance.</i></p>
<p><b>General comments from the public consultation – Criterion 4.5</b></p> <ul style="list-style-type: none"> <li>➤ There was general agreement on the criteria and that it adds value.</li> <li>➤ Several comments highlighted the need for further guidance, as well as contingency plans, protocols and drills.</li> <li>➤ Requests for Bonsucro to provide more information about best practices on storage.</li> </ul>		<p><b>Criterion 4.5 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Criterion 4.5 has been divided into two indicators. <ul style="list-style-type: none"> <li>○ 5.1.1: remains unchanged with one edit in the indicator’s title focusing on preventing pollution.</li> <li>○ 5.2.2: The SRWG elected to include a new indicator on providing training for handling and correct use of agrochemicals</li> </ul> </li> </ul>	

<ul style="list-style-type: none"> <li>➤ Suggestions that Bonsucro establish procedures for the proper handling of solid waste and control of disposal and transport as well as final destination. Bonsucro should also add an explicit definition of what safe storage of Agrochemicals means so it does not leave room for interpretation or the application of lax laws.</li> <li>➤ Additional suggestions were made:             <ul style="list-style-type: none"> <li>➤ Change criteria wording to “Management of storage and <b>treatment of</b> facilities for farm chemicals, fuel, lubricants, hazardous materials to prevent pollution”.</li> <li>➤ Change criteria wording to “Management of <b>facilities for storage, handling of</b> chemicals, fuel, lubricants and hazardous materials <b>on farms, with the objective of preventing</b> pollution”.</li> </ul> </li> <li>➤ Additional note on smallholders: A couple of respondents raised concerns about smallholders. Smallholders will lack space to properly house the chemicals and another asking if the changes to this criterion in the main Standard will affect the smallholder standard.</li> </ul>		<ul style="list-style-type: none"> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
4.5.1 - Management of storage facilities and safe handling of chemicals, fuel, lubricants and hazardous materials, with the objective of preventing negative impacts to biodiversity and ecosystems	Mill Agriculture  CORE INDICATOR	<u>100%</u>	<p>Agrochemical and other chemical are safely stored, access is restricted to the sole users, storage area is ventilated and allows for spillage management (such as a retention pond, etc)</p> <p>The operator must ensure that Agrochemicals and Fertilisers are stored securely on its supplying farms and in a manner that prevents unauthorised access and protects the environment in the event of spillage.</p> <p><i>For further information, see Guidance.</i></p>

### New Indicator

The SRWG has elected to include the following indicator requiring specific training for handling chemicals and other hazardous materials.

- Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)

### New indicator (post-public consultation with changes made by the SRWG)

<p>4.5.2 Specific training for handling and correct use of farm chemicals, fuel, hazardous materials, and record keeping of training and use.</p>	<p>Mill Agriculture</p>		<p>All workers - that handle or come into contact with farm chemicals, fuel, hazardous materials are trained, and at least one worker in each field group is trained in first aid. Training is conducted by a competent professional on safe management of these substances.</p> <ol style="list-style-type: none"> <li>a) Training is specific and relevant to the task(s) performed.</li> <li>b) An explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to farm chemicals, fuel, hazardous materials all substances to be used.</li> <li>c) Techniques for correct handling of these substances.</li> <li>d) Correct use of PPE.</li> <li>e) Preventative measures for reducing possible damage to health and the environment caused by the substances.</li> <li>f) Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances.</li> <li>g) Records of training are maintained, where appropriate on an individual basis. Record keeping of all use of farm chemicals, fuel, hazardous materials and reports. records are accurate, complete, up-to-date and accessible.</li> <li>h) All records shall be kept a minimum of two years</li> </ol>
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**PRINCIPLE 5 - CONTINUOUSLY IMPROVE OTHER KEY AREAS OF THE BUSINESS**

Operators are expected to implement Principle 5 for continuous improvement according to the following timeline:

Year of certification	% P5 indicators
First certification audit	-
Surveillance audit 1	20%
Surveillance audit 2	40%
Recertification audit	60%
Surveillance audit 1 onwards	80%

CRITERION	5.1 To promote economic and social sustainability	
<b>General comments from the public consultation – Criterion 5.1</b> ➤ Need for further guidance, especially on proposed methodology for implementation. For example, will it suffice to just present plans or will users		<b>Criterion 5.1 – Changes made by the SRWG</b> ➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)

need to present concrete, already designed, actions for implementation as well?

- A recurrent comment from industry respondents around the evolving nature of continuous improvement – it is a process that never ends.
  - What are the criteria that will be evaluated and indicated for this continuous improvement?
- Some respondents noted that the responsibility of investigating these requirements belongs to governments and universities rather than mills.
  - As such, there is a need for formal agreements with research institutions in order to help develop an interdisciplinary system for continuous improvement.
- Recurrent comment highlighting the importance of stakeholder consultation in the process, especially with workers.
- There were mixed opinions amongst industry respondents on the frequency for review, with some saying every year, others every two years and others every three years.
  - There was considerable concern on the scope of implementation being applied to the entire supply area and they are advocating for the scope to be limited to the certified area.
- Need for clarification on whether the analysis of this criterion also include the social well-being and upliftment of the farming community in terms of income generation through the investment measures made for improving the value from cane.
- Request for a plan for biosafety as GMOs are a real issue in the sugar sector.

- See specific indicator guidance for how the comments have been addressed.
- The standard allows for operators to identify their own priorities and targets according to their own resources, and develop their own implementation plans to reach the level set in the indicator.
- It is acceptable to utilise government and research institutions in research, and should be outlined in the research plan.
- **Biosecurity (biosafety) is included as part of the research plan.**

INDICATOR		Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)				
5.1.1 Research and extension plan in place	Mill Agriculture	Yes	<p>The operator must have in place a research plan that covers innovation &amp; research, continuous improvement and biosecurity. <i>For further information, see Guidance.</i></p> <p>Guidance: Innovation should be centralized and coordinated, encompassing business continuity plans and response protocols for emergencies (including health emergencies, environmental disasters, and others)</p>	
<p><b>Indicator 5.1.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Need for further guidance for this requirement, specifically a clear definition for 'centralisation' and what constitutes continuous improvement?</li> <li>➤ Questions were raised on the type of activities that must be implemented to meet the target, the need/purpose for a research and extension plan, and how would the 5-year implementation schedule work.</li> </ul>			<p><b>Indicator 5.1.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The indicator has been slightly changed for clarity and to focus primarily on research and innovation</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)				
5.1.1 Research and innovation plan in place	Mill Agriculture	Yes	<p>The operators shall establish a documented plan where they outline their approach and objectives to research and development.</p> <p><i>For further information, see guidance</i></p>	
Previous indicator (pre-public consultation)				

5.1.2 Value added per tonne cane	Mill Agriculture	Mill >14; \$/t cane Agric >10 \$/t cane	Value added by the operation is the value of sales less the price of goods, raw materials (including energy) and services purchased. <i>For further information, see Guidance.</i>
<b>Indicator 5.1.2 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ General view that operators have no control over sugar prices which can limit compliance with this indicator.</li> <li>➤ Respondent also felt that it would be advisable to just establish a decent price that allows the support of comprehensive sustainability strategies.</li> <li>➤ Need to clarify what it means in practice when the operator must have a 'positive added value'.</li> <li>➤ Comments also highlighted that progressive implementation should be allowed as the previous metric is significantly lower than the one currently proposed in this draft of the standard.</li> </ul>		<b>Indicator 5.1.2 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ No changes have been made to this indicator</li> <li>➤ Metric threshold has been set by analysis of certified producers calculator responses.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
5.1.2 Value added per tonne cane	Mill Agriculture	Mill >14; \$/t cane Agric >10 \$/t cane  Rationale to change from v4: Certification data showed	Value added by the operation is the value of sales less the price of goods, raw materials (including energy) and services purchased. <i>For further information, see guidance.</i>

		that the added value was actually closer to these new figures which is why they have been brought up	
Previous indicator (pre-public consultation)			
5.1.3 Environmental and social impact Management Plans updated biannually	Mill Agriculture	Yes	Environmental and social Management Plans updated every two years, clearly documenting how previously identified risks are managed. <i>For further information, see Guidance.</i>
<b>Indicator 5.1.3 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ General feeling among respondents that this indicator is redundant and therefore unnecessary as its elements are already covered in Principles 1 and 4. <ul style="list-style-type: none"> <li>➤ If included, Bonsucro must justify its importance and place in the standard.</li> <li>➤ On the other hand, NGO respondents requested that this indicator be changed to a core one.</li> </ul> </li> <li>➤ Mixed opinions among respondents as to the frequency of review and suggestions range from doing it only when needed, to every year, or to every three years.</li> </ul>		<b>Indicator 5.1.3 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ No changes have been made to this indicator</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ In a fast moving environment, it is best practice to regularly update management plans.</li> </ul>	

<p>➤ Several comments advocated for country legislation to be used as basis instead of the indicator (e.g. Guatemala where the environmental management plan only needs to be updated when changes are made to the installed capacity or in the operations that warrant a review by the Ministry of Environment and Natural Resources. As such updating the plan every two years will create additional work and cost for the company beyond what the law requires).</p>			
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
5.1.3 Environmental and social impact Management Plans updated biannually	Mill Agriculture	Yes	Environmental and Social Management Plans are periodically updated, clearly documenting how previously identified risks are managed.  <i>For further information, see guidance.</i>
<p><b>Previous indicator (pre-public consultation)</b></p>			
5.1.4 Findings of business context analysis continuously addressed in a time-bound manner	Mill Agriculture	90%	Internal and external audit processes demonstrate that systems improvements are ongoing; Stakeholder, worker & client grievance logs demonstrate ongoing management of relationships with workers, communities and clients; Environmental, social, quality and productivity monitoring data demonstrate continuous improvement.  <i>For further information, see Guidance.</i>
<p><b>Indicator 5.1.4 – Comments from the public consultation</b></p> <p>➤ General need for more guidance around the proposed methodology (e.g. how would the 5-year implementation schedule work) and the auditing process that is required to demonstrate compliance.</p>		<p><b>Indicator 5.1.4 – Changes made by the SRWG</b></p> <p>➤ No changes have been made to this indicator</p> <p>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</p>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
5.1.4 Findings of business context analysis continuously	Mill Agriculture	90%	Internal and external review processes demonstrate that systems improvements are ongoing; Stakeholder, worker & client grievance logs demonstrate ongoing management of relationships with

addressed in a time-bound manner			workers, communities and clients; Environmental, social, quality and productivity monitoring data demonstrate continuous improvement.  <i>For further information, see Guidance.</i>
<b>CRITERION</b>	<b>5.2 To reduce emissions and effluents. To promote recycling of waste streams where practical</b>		
<p><b>General comments from the public consultation – Criterion 5.21</b></p> <ul style="list-style-type: none"> <li>➤ Concerns that criterion 5.2 is not feasible to implement.</li> <li>➤ Little consideration for local context and national standards and requirements. Mills may have already invested in technology based on national legislation so it would be expensive and counter-productive to start over.</li> <li>➤ Strong demand that national legislations should take precedence over the Bonsucro standard. Otherwise, Bonsucro needs to provide some detailed guidance on the proposed methodology, what is being measured, at what level, what is the baseline measure, etc.</li> <li>➤ Request to have a progressive implementation plan for this criterion.</li> </ul>	<p><b>Criterion 5.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ Several changes have been made to this criterion to address concerns around feasibility.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> <li>➤ Progressive implementation for all indicators in P5 is included.</li> </ul>		
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			

5.2.1 Ambient air quality aligns with WHO guidance	Mill	40 µg/m <sup>3</sup> PM <sub>10</sub> 40 µg/m <sup>3</sup> NO <sub>x</sub> 20 µg/m <sup>3</sup> SO <sub>x</sub>	These values are for ambient air (not stacks emissions) as a 24hr mean for PM and SO <sub>2</sub> , and as an annual mean for NO <sub>2</sub> <i>For further information, see Guidance.</i>
<p><b>Indicator 5.2.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Requests to heavily revise this indicator for reasons raised below: <ul style="list-style-type: none"> <li>○ There is a significant chance that ambient air quality values are not met, even with the engine turned off at 100%, since the values as a country exceed these levels</li> <li>○ It is very wide to talk about air quality according to WHO standards, mills are not responsible for air quality on a large scale.</li> <li>○ Taking into account the total area of the mills and how scattered they are, it is important to verify if these air quality studies will be carried out in manufacturing or agriculture, and what would be the representative sample of the total area, additionally if it must be with entities accredited and aligned to the national standard.</li> </ul> </li> <li>➤ Respondents also raised several questions about 5.2.1, namely: <ul style="list-style-type: none"> <li>○ What is the boundary for ambient air quality? What is the value in conducting these tests?</li> <li>○ Will it affect the mill if neighbouring factories do not carry out good practices in protecting air quality? How do you measure what is their input in terms of air pollution compared to the user's? Who guarantees that the air that can be measured in a community is affected only by the plant's emissions?</li> </ul> </li> </ul>		<p><b>Indicator 5.2.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The SRWG has reviewed this indicator and elected to divide it into two: <ul style="list-style-type: none"> <li>○ 5.2.1: Operators monitor and document ambient air quality in nearest populations/communities</li> <li>○ 5.2.2: Operators measure and document fugitive and point-source air emissions and/or demonstrate Emission Estimation Techniques using Best Available Technologies</li> </ul> </li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			
5.2.1 Ambient air quality in nearest populations/communities	Mill	40 µg/m <sup>3</sup> PM <sub>10</sub>	These values are for ambient air (not stacks emissions) in nearest populations/communities as a 24hr mean for PM and SO <sub>2</sub> , and as an annual mean for NO <sub>2</sub> <i>For further information, see Guidance.</i>

aligns with WHO guidance		40 µg/m <sup>3</sup> NO <sub>x</sub> 20 µg/m <sup>3</sup> SO <sub>x</sub>	
<b>New indicator:</b>			
➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)			
5.2.2 Fugitive and point-source air emissions align with Best Available Technology and established safety/ environmental parameters	Mill	Evidenced by adherence to licenses AND documented emissions management	Operators can directly measure and report emissions or alternatively demonstrate Emission Estimation Techniques (EETs) as appropriate to the operation if they can demonstrate the use of Best Available Technologies (BAT) for their local operation/context.  EETs include: <ul style="list-style-type: none"> <li>· sampling or direct measurement; (commonly used for point-source emissions)</li> <li>· mass balance;</li> <li>· fuel analysis and/or other engineering calculations; and</li> <li>· emission factors (most commonly used for fugitive emissions from operations)</li> </ul> <i>For more information, see guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
5.2.2 Non-production waste plan for safely recycled or disposal	Mill Agriculture	Yes	The operator shall have a plan and implement recycling / re-using / safe & responsible disposal or storage (if other options are not available) programme for all of the following categories: fibre, metal, plastic, oil and lubricants, batteries and chemical products, rubber, wood, hazardous waste, glass and electronics. <i>For further information, see Guidance.</i>

<p><b>Indicator 5.2.2 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Concern that recycling facilities are often limited in some countries which makes it hard to recycle/re-use all the proposed waste categories.</li> <li>➤ Needs to clarify what happens when waste disposal is dependent on the local/national jurisdiction's ability to process the waste, e.g. what happens if chemical waste/hazardous waste cannot be processed off site?</li> <li>➤ There is also a need to define/detailed value modules from water/by product streams.</li> <li>➤ Suggestion that residues from health services should be added to the list of waste.</li> <li>➤ Another suggestion that hazardous and non-hazardous waste could be included and that users should reduce effluent emissions and waste generation through recycling and reuse.</li> <li>➤ Finally, several respondents suggested that compliance to 5.2.2 could be stimulated by goals, awards, recognition, etc.</li> </ul>		<p><b>Indicator 5.2.2 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ The scope of the non-production waste plan has been changed to cover the safe and disposal and/or recycling of a minimum of 50% of waste produced (previously covered all waste produced).</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<p><b>New indicator (post-public consultation with changes made by the SRWG)</b></p>			
<p>5.2.3 Non-production waste plan for safely recycled or disposal</p>	<p>Mill Agriculture</p>	<p>Minimum 50%</p>	<p>The operator has a plan and implements recycling / re-using / safe &amp; responsible disposal or storage (if other options are not available) programme for all of the following categories: fibre, metal, plastic, oil and lubricants, batteries and chemical products, rubber, wood, hazardous waste, glass, medical waste and electronics.</p> <p><i>For further information, see guidance.</i></p>

<b>CRITERION</b>		<b>5.3 To train employees and other workers in all areas of their work and develop their general skills</b>	
<b>General comments from the public consultation – Criterion 5.3</b> <ul style="list-style-type: none"> <li>➤ In general respondents felt that the number of hours training per worker is too high. While workers do require training to improve their skills in their work, once they have reached a certain level of competency, it is not sensible to continue giving training just to meet the time quota. <ul style="list-style-type: none"> <li>➤ Some suggested that the number of hours should be reduced to 12h while others highlighted that the number of hours needed will vary greatly depending on local context, with some countries only requiring very little additional training (e.g. Australia).</li> <li>➤ On the other hand, SNGOs pushed for the number of hours to be 16h.</li> </ul> </li> </ul>		<b>Criterion 5.3 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ The SRWG elected to remove indicator 5.3.2 on vocational training for workers displaced by mechanisation and merge it into the guidance for indicator 5.3.1 as an example of vocational training.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>INDICATOR</b>	<b>Scope</b>	<b>Standard</b>	<b>Full indicator wording</b>
Previous indicator (pre-public consultation)			
5.3.1 Time spent by workers in vocational training sessions	Mill Agriculture	16 hours per year	Operators shall provide all workers with 16 hours of training for vocational and/or occupational skills training. Training days shall be split between basic workers, intermediate management and upper management. <i>For further information, see Guidance.</i>
<b>Indicator 5.3.1 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Some clarifications needed on: <ul style="list-style-type: none"> <li>○ What are the topics of interest for the training;</li> <li>○ Definition of control metrics on continuous training with a suggestion to add a topic for job relocation or to propose ways job placement in other labour markets (for 5.3.2 - workers displaced by mechanisation).</li> <li>○ Whether mandatory training (such as health and safety which is required by law) can be counted in the training hour quota.</li> </ul> </li> </ul>		<b>Indicator 5.3.1 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ The SRWG has made following changes to the indicator: <ul style="list-style-type: none"> <li>○ Changed to an average of 16 hours per year or the full time equivalent of 16 hours per year for part-time/seasonal workers.</li> <li>○ Requirement to develop a training plan ahead of each harvest or cutting cycle</li> </ul> </li> </ul>	

<ul style="list-style-type: none"> <li>○ Definition of 'direct employee'. It remains unclear whether ALL workers should receive this vocational training.</li> </ul> <p>➤ Concern that compliance with 5.4.1 requires that mills should have their own specialized personnel and allocate effective man-hours for over-training of the personnel. It would be difficult to implement given the costs it would entail, especially in the current economic context.</p> <p>➤ <u>Suggestions raised:</u></p> <ul style="list-style-type: none"> <li>○ The preparation of a training plan for each harvest or cutting cycle could also be added to the criteria</li> <li>○ There should be a Standard Operating Procedure (SOP) for the stakeholder to map the skills of the workers (gender specific if possible) and assessing their training requirement as well as level of education.</li> <li>○ training should not be measured in number of hours and specific frequency. It should be evaluated based on the effectiveness of the training programs such as verifying directly with the worker if they have the knowledge or not</li> </ul>	<ul style="list-style-type: none"> <li>➤ Vocational training for workers displaced by mechanism (previously covered in indicator 5.3.2) has been included as an example of training in the indicator's guidance.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>
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New indicator (post-public consultation with changes made by the SRWG)			
5.3.1 Time spent by workers in vocational training sessions	Mill Agriculture	Average 16 hours per year (or full time equivalent of 16 hours per year)	<p>The operator provides an average of 16 hours of training for vocational and/or occupational skills training to all workers. Training days are split between basic workers, intermediate management and upper management.</p> <p>A training plan is prepared ahead of each harvest or cutting cycle (in cases where the harvest or cutting cycle is continuous, the training plan is annual).</p> <p><i>For further information, see guidance.</i></p>

Previous indicator (pre-public consultation)			
5.3.2 - Vocational training for all workers displaced by mechanisation.	Mill Agriculture	16 hours per year	When mechanisation plans displace permanent and seasonal workers, vocational training is provided to certify labourers in new fields of work. Certifications of training can be developed in collaboration with educational institutions, government agencies, INGOS, development banks and other partners to provide legitimate certification of skills acquisition. <i>For further information, see Guidance.</i>
<b>Indicator 5.3.2 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Several respondents felt that 5.4.2 should/could be removed as most activities are now fully mechanised, so displacement is no longer an issue. <ul style="list-style-type: none"> <li>○ For example one comment stated: <i>"This indicator establishes the responsibility of the operator to provide professional training to certify workers in new work environments when mechanization plans displace workers. It is not considered pertinent to include this indicator in the Standard as it is proposed, as it represents a complete imbalance that undermines the pillar of economic sustainability. This foregoing creates an unbalanced scenario between responsibilities and rights, since the economic objectives of the revision of the Standard are still not completely clear. It is requested to remove this indicator."</i></li> </ul> </li> <li>➤ Several respondents also pointed out that the responsibility for the training of workers displaced by mechanization belongs to the public institutions of the state responsible for education and not to companies.</li> </ul>		<b>Indicator 5.3.2 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ This indicator has been removed from the standard. Training for all workers displaced by mechanisation has been included in the guidance for indicator 5.3.1 as an example of vocational training.</li> </ul>	
<b>CRITERION</b>	<b>5.4 Continuous improvement of worker welfare</b>		

INDICATOR	Scope	Standard	Full indicator wording
Previous indicator (pre-public consultation)			
5.4.1 - Occupational health and safety is promoted in the whole cane supply area.	Whole supply area	Yes	<p>The operator shall promote a safe working environment at its sugar cane supply base. <i>For further information, see Guidance.</i></p> <p>Guidance: This will be done through identifying gaps, raising producer awareness and tracking improvements.</p>
<p><b>Indicator 5.4.1 – Comments from the public consultation</b></p> <ul style="list-style-type: none"> <li>➤ Respondents (mainly from the industrial and mill categories) felt that the scope for 5.4.1 and 5.4.2 should be limited to the unit of certification due to the financial implications and the lack of management control over independent producers. <ul style="list-style-type: none"> <li>○ Social NGOs maintained the view that the scope should be the supply area.</li> </ul> </li> <li>➤ Several comments requested indicators 5.4.1 and especially 5.4.2 to become core indicators due to their importance in establishing worker welfare.</li> <li>➤ Need for more guidance for both indicators, especially on what is expected as proof of implementation/compliance, as well as providing references to practices and experiences of implementation.</li> </ul>		<p><b>Indicator 5.4.1 – Changes made by the SRWG</b></p> <ul style="list-style-type: none"> <li>➤ No changes have been made to the indicator.</li> <li>➤ The scope remains at the whole cane supplying area and is subject to the timebound progressive implementation plan.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			

5.4.1 - Occupational health and safety is promoted in the whole cane supply area.	Whole supply area	Yes	The operator promotes a safe working environment at its sugar cane supply base. <i>For further information, see Guidance.</i>
Previous indicator (pre-public consultation)			
5.4.2. Safe worker accommodation in cane supplier area	Whole supply area	Yes	The certified company must promote minimum legal standards accommodation on its sugar cane supply base. <i>For further information, see Guidance.</i>  Guidance: This is done through identifying gaps, raising producer awareness and tracking improvements.
<b>Indicator 5.4.2 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ Same comments as indicator 5.4.1</li> <li>➤ Respondents (mainly from the industrial and mill categories) felt that the scope for 5.4.1 and 5.4.2 should be limited to the unit of certification due to the financial implications and the lack of management control over independent producers. <ul style="list-style-type: none"> <li>○ Social NGOs maintained the view that the scope should be the supply area.</li> </ul> </li> <li>➤ Several comments requested indicators 5.4.1 and especially 5.4.2 to become core indicators due to their importance in establishing worker welfare.</li> <li>➤ Need for more guidance for both indicators, especially on what is expected as proof of implementation/compliance, as well as providing references to practices and experiences of implementation.</li> </ul>		<b>Indicator 5.4.2 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ No changes have been made to the indicator.</li> <li>➤ The scope remains at the whole cane supplying area and is subject to the timebound progressive implementation plan.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
New indicator (post-public consultation with changes made by the SRWG)			

5.4.2. Safe worker accommodation in cane supplier area	Whole supply area	Yes	The certified company promotes minimum legal standards accommodation on its sugar cane supply base.  <i>For further information, see Guidance.</i>
<b>Previous indicator (pre-public consultation)</b>			
5.4.3. Gender inclusion in management and technical positions	Mill Agriculture	15%	Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator shall conduct community based women's empowerment training. Recruitment operations increases women's presence in the workforce to meet operation established targets not less than 15% of total workforce.  <i>For further information, see Guidance.</i>
<b>Indicator 5.4.3 – Comments from the public consultation</b> <ul style="list-style-type: none"> <li>➤ While respondents were generally supportive of the intent behind 5.4.3, majority of the respondents felt that this indicator is difficult to implement.</li> <li>➤ Nearly all respondents felt strongly that this indicator will force operators to meet a percentage of women by obligation without taking into account the capacities of the candidates as well as the supply and demand for labour. Gender equality should not be established by a specific percentage but by evidence of equal opportunities in the recruitment processes. <ul style="list-style-type: none"> <li>○ As such, the general view was for this indicator to be removed or amended to reflect the points raised above.</li> </ul> </li> <li>➤ Suggestion to focus the approach on training more female staff until the target of 15% is reached.</li> <li>➤ A question was been raised on whether the 15% target included temporary workers.</li> </ul>		<b>Indicator 5.4.3 – Changes made by the SRWG</b> <ul style="list-style-type: none"> <li>➤ No changes have been made to the indicator.</li> <li>➤ The scope remains at the whole cane supplying area and is subject to the timebound progressive implementation plan.</li> <li>➤ Guidance has been developed setting out the expectations around compliance with this indicator (see annex 2 of the standard)</li> </ul>	
<b>New indicator (post-public consultation with changes made by the SRWG)</b>			

5.4.3. Gender inclusion in management and technical positions	Mill Agriculture	15%	<p>Applies to all workers on the premises of the mill and farms included in the unit of certification. The operator conducts community-based women's empowerment training. Recruitment operations increases women's presence in the workforce to meet operation established targets not less than 15% of total workforce.</p> <p><i>For further information, see Guidance.</i></p>
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